

West Virginia Weatherization Assistance Program

State of West Virginia
Office of Economic Opportunity

PART I - MASTER FILE
PY 2015 - 2016



State of West Virginia Office of Economic Opportunity

U.S. Department of Energy Program Year: 2015-2016 State Plan Master File

V. MASTER FILE

V.1. Eligibility

The West Virginia Weatherization Assistance Program (WV WAP) will ensure that every dwelling weatherized meets both client eligibility and building eligibility requirements as detailed in *Sections V.1.1* and *V.1.2*.

V.1.1 Approach to Determining Client Eligibility

Definition of Income Used to Determine Eligibility:

The WV WAP will determine eligibility of a dwelling unit based on the amount of household income and the conformity of that income to criteria established by the Low-Income Home Energy Assistance Act of 1981, 42 U.S.C. 8621. All Sub-recipients in the WV WAP will use 200% of the Office of Management and Budget (OMB) poverty guidelines for determining income eligibility as per the Department of Energy (DOE) WPN 15-3 Poverty Income Guidelines and Definition of Income. The WV WAP data management system calculates a twelve month income period needed to create an annualized income equivalent for comparison to the Poverty Income Guidelines. Annualized income may be calculated using less than 12 months of income information. At least one month of recent income is necessary for the database management system to calculate the annualized income for eligibility determination. In addition, family units that have received cash assistance payments under Title IV or XVI of the Social Security Act, or applicable State or local law paid during the twelve-month period preceding application, will be eligible for weatherization pursuant to 10 CFR Part 440.22.

Eligibility Procedures:

The State of West Virginia Office of Economic Opportunity (OEO) has established an extensive intake/application process involving obtaining information from prospective program

participants before a decision can be made on their eligibility for weatherization assistance. Each applicant must provide all of the items outlined as "mandatory data fields" in the application process/form. All prospective applicants will be required to identify and provide verification of the amount and source of all their income for their household. Additional data fields included in the state data management system require the collection and reporting of household demographic and residence specific information including but not limited to whether the applicant rents or owns his/her home. All applicants are required to sign their application and certify to the validity of the information provided. Falsification of an application is subject to prosecution.

OEO has developed specific and detailed guidance in a policy (WAP Application and Review Queue Management Policy) on how the Sub-recipients are to utilize the various functions of the database management system to ensure there is consistency among the WV WAP Network on how a client proceeds through the various stages of the weatherization process. This policy will remain in effect for PY 2015 – 2016.

Income Verification Procedures:

The eligibility documentation is maintained in the database management system and may be supplemented with a physical client file. All eligibility documentation is to be reviewed for compliance by the Sub-recipient prior to weatherization services being provided. In the event that six (6) months or more has lapsed between the date of application and the date weatherization services is scheduled to begin on a particular job, the income of that client must be re-verified as per WV WAP requirements. OEO provides a secondary review of eligibility documentation and process selecting a sample of weatherization dwellings during the monitoring process. OEO issued an *Income Eligibility Policy* on November 19, 2013 to provide updated uniform guidelines on the definition of income and determining income eligibility. OEO also provides to the WV WAP Network the Poverty Income Guidelines and Definition of Income document as revised by DOE each program year.

All 55 counties of West Virginia are eligible for weatherization services and will be served by the WV WAP. Any West Virginia resident who meets client eligibility requirements and whose dwelling meets building eligibility requirements would be eligible to receive weatherization services. As per DOE requirements and 10 CFR 440.16(b), priorities are given to certain portions of the eligible population. The WV WAP has also incorporated some priority features to enhance the DOE required priority eligible population categories and allow for reasonable, efficient, and effective implementation of the WAP. These priorities and the process followed are described in *Section V.3 Priorities*.

Qualified Aliens Eligibility for Benefits:

The steps in the application/intake process detailed in the previous *Eligibility Procedures Section* ensure DOE weatherization services shall only be provided to eligible populations.

These same procedures are utilized for WV's Low Income Home Energy Assistance Program (LIHEAP) Weatherization services.

V.1.2 Approach to Determining Building Eligibility

Reweatherization:

The WV WAP has procedures in place to comply with DOE regulations and 10 CFR 440.18(e)(2)(iii) regarding reweatherization. Prior to any weatherization activity, a unit must be evaluated to determine whether previous weatherization services were provided after **September 30, 1994**. If services have been provided after this date with DOE funds, the unit is not eligible for additional weatherization services with DOE funds.

The following actions must be taken on each unit prior to weatherization services to ensure the homes that have received weatherization services after September 30, 1994 are not reweatherized:

- Each client's address must be entered into the data management system to identify whether the client's home has been weatherized during or after 2007 (length of WV WAP historical records with searchable addresses);
- 2. Each client's name must be entered into the data management system's "Old Weatherization Data" module, to check if the client has previously been reported as a completion during 1996 to 2007 (length of WV WAP historical records with client names only). If the client's name is found in the data management system as having had weatherization services, the Sub-recipient will verify with the client if they are living at the same address as when they received weatherization services in the past. If the client verifies that this is the same address, then the dwelling is ineligible for weatherization services.
- 3. A secondary verification occurs as each client must be asked whether their home has been weatherized after September 30, 1994.
- 4. If a dwelling passes the first two verification steps, a third verification step is performed as a visual inspection of each home must be completed by an auditor to identify whether previous weatherization measures have been performed. If the home was completed after September 15, 2011, Sub-recipients are required to place standardized tags on specified areas of dwellings after completing the Weatherization process. This procedure is outlined in the WAP Weatherized Unit Tagging Procedure as Amended February 9, 2012.
- 5. If there are no documented, verbal, visual, or physical evidence of previous weatherization services, the Sub-recipient may proceed with weatherization services on the dwelling.

- 6. Sub-recipients may provide services to a dwelling unit previously weatherized prior to September 30, 1994, as noted in the American Reinvestment and Recovery Act of 2009 and DOE WPN 15-1, Application Instructions Section V.1.2. A reweatherized unit falls into the category of time indicated above and described under 10 CFR 440.18(e)(2)(iii). DOE gives Sub-recipients the flexibility to revisit those homes weatherized prior to September 30, 1994 that may not have received the full complement of Weatherization services, including the use of an advanced energy audit or addressing health and safety concerns.
- 7. The DOE-issued *Weatherization Program Notice 12-7 Disaster Planning and Relief* allows for additional work to be done on homes due to natural disasters. In the event of a declared Federal or State disaster, allowable expenditures under WAP include:
 - The cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective.
 - The cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials (10 CFR 440.18(d)(9); 10 CFR 440.18(d)(15).
 - To the extent that the services are in support of eligible weatherization (or permissible reweatherization) work, such expenditure would be allowable.

In the event of a declared Federal or State disaster, weatherization crews may return to a unit reported as a completion to DOE that has been "damaged by fire, or act of God to be reweatherized, without regard to date of weatherization" as per 10 CFR 440.18(f)(2)(ii). Local authorities must deem the dwelling unit(s) salvageable as well as habitable and if the damage to the materials is not covered by insurance or other form of compensation.

- Debris removal from a dwelling unit that is not to be weatherized would not be an allowable cost.
- Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such activities include: securing weatherization materials, tools, equipment, and weatherization vehicles, or protection of local Sub-recipient weatherization files, records and the like during the initial phase of the disaster response.
- Using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable.
- Local agencies may use weatherization vehicles and/or equipment to help assist in disaster relief provided by WAP is reimbursed according to the DOE Financial Assistance Regulations 10 CFR Part 600.

WAP rules require that priority be given to identifying and providing weatherization assistance to elderly persons, persons with disabilities, families with children, high residential energy users, and households with high energy burdens as per 10 CFR 440.16(b). However, it would be permissible to consider in households located in the disaster area, as a priority as long as the households are eligible and meet one of the priorities established in regulation and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster.

As referenced in #4 above, OEO developed and implemented a Weatherized Unit Tagging Procedure policy on September 15, 2011 (amended on February 9, 2012) to identify dwellings as "Weatherization Completions" and maintain compliance with DOE's Reweatherization Policy. WV WAP's Weatherized Unit Tagging Procedure requires the placement of a permanent and standardized tag on each completed dwelling unit including the following information:

- a. Sub-recipient Name
- b. WV Weatherization Assistance Program
- c. Sequential Number
- d. "DO NOT REMOVE" indication
- e. Initials of Sub-recipient Quality Control Inspector and date of Quality Control Inspection (indicated in permanent marker)

There are specific locations in the dwelling outlined in the policy where the Sub-recipients are to attach the tags in an effort to make them as permanent as possible. The Sub-recipient is to attach two tags in different locations in each dwelling in the case that one would become detached. The Sub-recipient must also maintain a picture of the tag and its location in the dwelling unit as a Portable Document Format (PDF) in the data management system. Failure to adhere to the policy could result in the dwelling unit not being deemed as a "Completion" and in turn all associated costs could be disallowed. The procedure implemented also maintains sufficient accountability of the Sub-recipient (and specific Quality Control Inspector) providing the weatherization services on a particular dwelling.

Eligible Structures:

Sub-recipients shall ensure that weatherization services are being provided to low-income persons that live in standard types of housing (i.e. single family, rentals, manufactured housing, and multifamily buildings). Sub-recipients will exercise caution when approaching non-traditional type dwelling units including but not limited to shelters and apartments over businesses. OEO will seek guidance from the WV DOE Project Officer as necessary if the WV WAP approaches a non-traditional dwelling. Weatherization of non-stationary campers and

trailers that do not have a mailing address associated with the eligible applicant will not be allowed, even if utilizing a post office box. For procedures regarding structures that require deferral of services due to the structure being deemed at least temporarily ineligible, refer to the *Deferral Process* in a following segment of this section.

Historic Preservation

As noted in DOE Weatherization Program Notice 10-012, DOE in coordination with the Advisory Council on Historic Preservation (ACHP) and the National Conference of State Historic Preservation Officers (NCSHPO), has developed a Prototype Programmatic Agreement (PA) to address historic preservation requirements for the WAP. The WV WAP is evaluating all section 106 reviews utilizing guidelines set forth in a Letter of Understanding with the WV Division of Culture and History State Historic Preservation Office (SHPO). All measures that fall outside the Weatherization Assistance Program exempt from weatherization Section 106 review are being approved by WV SHPO. OEO has a staff member dedicated to Historic Preservation review, approval, and guidance for WV WAP Sub-recipients.

Our intention is to work very closely with our State SHPO office and to utilize the Prototype PA to overcome the challenges before us while still meeting all guidelines of the Act as outline by NHPA. This will not only build a strong partnership that will prove advantageous to our respective organizations but also to the West Virginia families that we strive to serve.

West Virginia's State Energy Program (SEP) Office has not been able to negotiate a SHPO PA and consequently our state does not have an official DOE Historic Preservation PA. As a result, beginning in PY2010, our state Weatherization Program Office worked with WV SHPO to negotiate, draft and agree to a one year Letter of Understanding for Historic Preservation Section 106 review compliance for weatherization activities. In subsequent years, renewed letters were executed. On December 1, 2014, OEO began a new three year Letter of Understanding with WV SHPO, through November 27, 2017. After that time, we will seek a renewed letter to continue compliance.

Rental Units:

The WV WAP may provide weatherization to rental units, including multiple dwelling units. The WV WAP has procedures that address the protection of renters' rights as per 10 CFR 440.22(b)(3) and 440.22(c)-(e). No rented dwelling unit can be weatherized without first obtaining the written permission of the owner (or his/her agent) of the dwelling unit. Completion of the "Owner Agreement of Rental Homes" form will be mandatory for rental units.

The "Owner Agreement of Rental Homes" form is designed to assure the following:

- That the benefits of weatherization assistance shall reside primarily with the low income tenants;
- For a reasonable amount of time, the rent shall not be raised because of the increased value of dwelling unit(s) due solely to weatherization assistance provided under this program;
 - Should a rental increase occur and the tenant perceive it to be due solely to the weatherization services provided, the tenant would notify the applicable Sub-recipient who would then contact OEO, or the tenant may contact OEO directly.
 - OEO will instruct the tenant to file a written complaint with OEO detailing the situation and the perceived reason for the rent increase.
 - OEO will make contact with the landlord and notify the landlord that a complaint has been filed, and provide the landlord with a copy of the complaint. The landlord will have the opportunity then to appeal the complaint.
 - OEO will obtain all of the pertinent information applicable to the dwelling and the weatherization services received and will review all of the information provided.
 - OEO will work to resolve the situation in a way agreeable to all parties. OEO encourages the use of alternative dispute resolution procedures including arbitration.
- 3. That no undue or excessive enhancement shall occur to the value of the dwelling unit;
- 4. That the landlord understands the requirements set forth by the *Financial Participation Policy for Rental Units* that requires a landlord with income outside of the poverty guidelines of the WV WAP, to contribute a percentage of the costs of the various weatherization measures.

In the event that all possible negotiations with the landlord have been attempted yet the landlord refuses contribution, the dwelling may still be weatherized with proper documentation and approval from OEO.

All Multifamily units will follow the established client prioritization protocols as established in single-family weatherization, unless otherwise determined by OEO. Multiple dwelling units are defined as buildings containing 5 units or more and can be weatherized if 66% (50% for duplexes and quadraplexes) of the occupants qualify for weatherization assistance pursuant to Federal Regulation 10 CFR 440.22. Weatherization services provided to multifamily dwelling units will also be supported by OEO's Multiple Dwelling Unit Policy and Guidance implemented

in February 25, 2011 detailing the process, procedures, and requirements including the "WV Multifamily Owner Agreement" which is similar to the owner agreement described above, but adapted for Multifamily units.

Deferral:

The WV WAP developed and implemented a WV WAP *Deferral Policy* on August 21, 2012 to assist in the decision to defer weatherization assistance on an eligible dwelling in attempt to standardize the procedure throughout West Virginia. As per the policy, a deferral does not mean that weatherization assistance will never be available, but that work must be postponed until the problems at the home can be resolved. Sub-recipient crews and contractors are expected to pursue all reasonable options on behalf of the client, within program guidelines. After an on-site visit has been conducted, if conditions warrant, and the Sub-recipient determines that the home meets one or more of the following deferral conditions, a letter must be sent to the client outlining the conditions present at the dwelling and the justification for deferral. The reason for deferral must be selected and documented in the database management system.

Possible deferral conditions include but may not be limited to the following:

- a. Structurally unsound dwelling that is not suitable and adaptable to Weatherization, and the Weatherization Program does not have the resources to do necessary repairs.
- Electrical or plumbing hazards that cannot be resolved prior to or as part of Weatherization services.
- c. The presence of raw sewage around or in any part of the dwelling.
- d. The presence of a dead animal, or animal feces, in an area where program staff must install weatherization measures.
- e. Excessive debris and clutter around the dwelling that limits access to the dwelling.
- f. Pets unchained or running loose that would be distracting or unsafe to program staff.
- g. The client is uncooperative, abusive, or threatening to the crew, or there is an apparent threat of violence or abuse to any program worker, or any household member, during the weatherization process.
- h. The presence or use of any controlled substance in the dwelling during the weatherization process.

- Environmental hazards, such as serious moisture problem, known excessive radon, friable asbestos, excessive lead paint, or other environmental hazards that cannot be resolved prior to or as part of the weatherization services.
- Evidence of substantial infestation of rodents, insects, bats, or other harmful/objectionable animals that are difficult to control.
- k. Major remodeling is in progress, limiting the proper installation of weatherization measures.
- I. Substantial standing water in or around the crawl space or basement area limiting the proper completion of Weatherization measures.
- m. Dwelling resident has a medical condition that prohibits the installation of insulation and/or other weatherization measures.
- n. No cost-effective or appropriate health and safety measures can be done to the house resulting in minimal energy savings.
- Customer in arrears with utility vendor, gas service has been shut off, or electric service has been shut off.
- p. Client refusal of primary energy conservation measure (SIR ≥ 2).
- q. Client refusal of Health & Safety measure(s) necessary for client safety.
- r. Income verification needed.
- s. Updated utility information needed.
- t. Other conditions not listed above that prohibit complete weatherization.

There are several steps detailed in the WV WAP *Deferral Policy* outlining the Sub-recipient and/or client's responsibilities after the aforementioned deferral letter is generated in order to possibly complete weatherization for a client that was originally deferred. These steps involve allowing the client to correct the identified issues or barriers to weatherization and providing the Sub-recipient with documentation that issues have been addressed. There is also a procedure in place in the event that issues are not addressed or no response is received from the client. All applicable steps must be followed and all required documentation retained.

V.1.3 Definition of Children

In terms of prioritizing households including children, the State of West Virginia has defined "children" as those 18 years old and under in compliance with 10 CFR 440.3

V.1.4 Approach to Tribal Organizations

In accordance with federal rule, the State of West Virginia recommend that tribal organizations not be treated as local applicants eligible to submit an application to operate a Weatherization Assistance Program. In accordance with 10 CFR 440.16(f), low-income Native Americans will receive benefits equivalent to assistance provided to other low-income persons within the State as eligible individual applicants under program guidelines.

V.2 Selection of Areas to be Served

The method used to select each area to be served by a weatherization project will be as follows:

- 1. All 55 counties in West Virginia will be served by the WV WAP.
- 2. Selection of weatherization Sub-recipients or qualified entities is made pursuant to 10 CFR 440.15.
- Sub-recipients in the state operate the WAP in service areas designated by specific counties, barring any unforeseen circumstances necessitating service area alteration. Sub-recipients may contract with one another in efforts to more efficiently and effectively provide weatherization services to all counties within a Sub-recipient's service area.
- 4. In the event that OEO determines that a Sub-recipient fails to meet WV WAP grant agreement requirements, options include (but are not limited to) allocating the funds to other eligible Sub-recipients or qualified entities in the State.

V.3 Priorities

The WV WAP will give priority to identifying and providing weatherization assistance to elderly persons (60 years of age or older), persons with disabilities, and households with children (18 years of age or younger). Priority can also be given to households with a high energy burden which has two components to its definition. Clients can be considered high energy burden if:

a. 20 percent or more of the household income is utilized to pay for energy usage and/or;

b. Clients are eligible for the Energy Crisis Intervention Program (ECIP), a component the LIHEAP funding the WV WAP receives from the WV Department of Health and Human Resources (DHHR).

All of these priorities are weighted the same with regards to the points they receive except for ECIP eligibility allowing for comprehensive weatherization services to be provided within a reasonable amount of time from when the client received ECIP services, increasing the efficiency and cohesiveness between the programs.

Another factor considered when prioritizing clients in order to have an reasonable and equitable system is the time spent on the wait list; however clients only receive 1 point per year and therefore it will be ensured that time on the waitlist does not outweigh other factors within the prioritization system.

During PY 2015-2016, the WV WAP will also incorporate identification and targeting of high energy users (i.e. energy usage is above average as a result of household composition and/or unusual needs for energy) as a priority group, in collaboration with WV WAP utility partners. OEO is in the process of identifying the parameters of this priority for the various fuel types, and OEO will then incorporate the parameters into a policy regarding the procedures of tracking energy usage data in the database management system. It is OEO's intention to gather data from Oakridge National Laboratories for non-metered fuel types in order to allow the priority opportunity to be standard among all applicants.

The WV WAP has also incorporated some priority features to enhance the DOE required priority eligible population categories and allow for reasonable, efficient, and effective implementation of the WAP. Such prioritization features allow for services in consideration of timing of services provided by other funding sources.

As mentioned in Section V.7 Health And Safety, OEO has pursued and has been granted an amount of LIHEAP funds for Healthy Homes/Weatherization Plus Health Pilot Projects for the second year. In efforts to run Healthy Homes pilots efficiently and effectively in conjunction with the regular WV WAP services and embracing the intent of the Healthy Homes/Weatherization Plus Health initiative, there is also the opportunity for clients participating in the Healthy Homes/Weatherization Plus Health Pilot projects to receive priority additional to the DOE mandated priority factors.

In addition, there are utility funds that supplement the WVWAP and federal and non-federal resources are blended in order to serve more low-income clients as well as provide additional services than the traditional WAP is unable to provide. There are situations in which clients for eligible certain utility program funding may receive priority in order for the utility funds to be expended effectively and within the proper time periods. This allows the WV WAP to continue to obtain these funds for future program years.

Finally, there could be instances in which clients are given priority as part of a multifamily project completion. Clients in an identified eligible multifamily dwelling may not all be at the top of the prioritization list, and therefore additional priority could be given to the clients in order for the project to be able to be completed. However, OEO requires Sub-recipients to plan for the completion of multifamily dwellings and ensures that multifamily projects do not supplant services provided to single-family dwellings, which are the large majority of completions for the WV WAP.

OEO has developed a point system to rank clients using the aforementioned prioritization criteria in the data management system that tracks all clients, dwellings and weatherization work. The WV WAP Sub-recipients must adhere to this prioritization list and point system within the data management system unless otherwise directed or approved by OEO.

OEO may modify the prioritization system throughout the program year within the parameters of the program in instances including but not limited to adjusted rules and regulations or additional funding sources identified. The intent will be to conserve the maximum amount of energy possible while serving the needs of each community. Sub-recipients do not have the ability to manipulate or alter the prioritization system or criteria without written approval from OEO.

OEO implemented WAP Priorities for Service Delivery on July 1, 2014 which will remain in place for PY 2015 – 2016. OEO modified the database management system to ensure clients are being prioritized properly and effectively. The database management system only allows those clients highest on the priority list (based on the previously described point system) to be selected to be served by a particular Sub-recipient, unless otherwise approved by OEO. The system allows for a reasonable "pool" of high priority clients a Sub-recipient has to select from so that there is flexibility built in to the system, while also ensuring all clients served are high priority clients. Due to the number of high priority clients that will be available to a Sub-recipient to select from, OEO does not anticipate any issue with all counties in WV being provided weatherization services in an efficient and effective manner throughout the year. However, this process will be monitored throughout the year by OEO and adjusted as necessary.

Sub-recipients shall ensure that weatherization services are being provided to low-income persons that live in standard types of housing (i.e. single family, rentals, manufactured housing, and multifamily buildings). Housing type is not a recognized priority. OEO will monitor the system to ensure eligible clients are not discriminated against due to housing type.

V.4 Climatic Conditions

West Virginia is the 41st largest of the 50 United States with a total area of 24,230 square miles. Within its boundaries, elevations reach as high as 4,863 above sea level (Spruce Knob in

Pendleton County) and as low as 240 feet above sea level (Potomac River on the Virginia border).

The International Energy Conservation Code (IECC) has defined (2) distinct climate zones that cover West Virginia. These climate zones help approximate the performance of a building within each zone due to the effects of heating- cooling demand, precipitation, and relative humidity. A rough map of the IECC climate zones is included as an attachment with this application.

Due to the variations in climate throughout the state, each energy audit shall be adjusted to most accurately model the climactic conditions of the individual location. Likewise, each energy audit shall indicate the model climate used represented as locations included in the DOE approved auditing software (the Weatherization Assistant software as described in *V.5.2 Auditing Procedures.*) At the present time, Zone 1 is identified as Charleston, WV and Zone 2 is identified as Elkins, WV in the DOE approved auditing software.

Cooling degree days and heating degree days data is submitted as an attachment to the application. Based on the cooling degree days and dual climate zones, the WV WAP has included specific cooling measures under certain circumstances as detailed under Section V.7 Health And Safety.

Heating Degree Day (HDD) and Cooling Degree Day (CDD) data may be found from the link below.

 National Climatic Data Center (using information from the NOAA) http://ggweather.com/normals/

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

All measures and incidental repairs performed on client homes will meet the specifications, objectives and desired outcomes outlined in the Standard Work Specifications (SWS) for Home Energy Upgrades. OEO partnered with Community Housing Partners Energy Solutions Training Center (CHP) to develop the WV WAP Standard Work Specifications utilizing the "Deck of Cards" model. This document will function as a combination standards and field guide. These field standards meet or exceed the minimum standards outlined in the national SWS. The document references the appropriate SWS for the procedure being described and clearly states with narrative and photographs the required specifications for that procedure. It will function as in-field instructional reference guide for program supervisors and technicians and will replace the WV WAP Field Standards (2009). The dated field guide that was in use up to PY 2015 – 2016 was "decommissioned" from a document used as a day-to-day guide/manual, to a

document now to be used as desk reference literature, replaced in the field by the new comprehensive SWS product.

The WVWAP also utilizes the West Virginia Finance and Administrative Guide (2005) outlining procedures and requirements for overall WV WAP program management. (To be updated)

OEO develops and distributes West Virginia Weatherization Program Notices (WV WPN) and West Virginia Weatherization Bulletins (WV WXBulletin) to provide additional guidance on specific requirements and major program updates and/or changes. These notices are in supplement to DOE Weatherization Program Notices.

Prior to the start of PY 2015 – 2016, OEO will distribute the WV WAP Standard Work Specifications to Sub-recipients to advise them of the expectations of work quality. OEO provides all Sub-recipients with technical requirements for field work including: audits/testing; installation of energy conservation, health and safety and incidental repair measures; and final inspections. OEO confirms receipt of those requirements by a signature on the Sub-recipient PY 2015 – 2016 DOE WAP Grant Agreement serving as proof of receipt.

The specifications for work to be inspected is referenced in the Sub-recipient PY 2015 – 2016 DOE WAP Grant Agreement. Contractors hired by the Sub-recipient must have agreements that include the same technical requirements referenced above. The work of the contractor must be consistent with all WV WAP standards and requirements.

An initial training will be provided at the WVCAP conference in May 2015 on the use of the SWS document and any new field requirements/procedures, with the assistance of CHP. Then additional trainings will occur during PY 2015 – 2016 as needed. This aspect of compliance to DOE WPN 15-4 is described in greater detail in *Section V.8.4 Training and Technical Assistance*.

Language Added to Sub-recipient Grant Agreements:

To meet requirements within DOE WPN 15-4, OEO added the following language to the WV WAP Sub-recipient Grant Agreements:

"The Sub-recipient shall perform weatherization services during the Program Year in accordance with the WV WAP State Plan, the WV WAP Standard Work Specifications, and other OEO WV WAP manuals or directives as applicable and any amendments thereto. The Sub-recipient's signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph, as well as the Sub-recipient's responsibility to ensure weatherization staff and sub-contractors receive and review these documents and use them to guide the weatherization work performed in client homes."

Potential Pilot Project:

All weatherization work is to be performed in accordance to the DOE approved energy audit procedures and 10 CFR 440 Appendix A with one exception upon various levels of approval from DOE. The WV WAP has interest in pursuing a pilot project of photovoltaic (PV) solar installations in weatherization, focusing on multifamily apartment buildings. OEO understands the need to follow the weatherization process including intake and eligibility procedures, proper procurement and energy audit procedures for the Savings-to-Investment ratio of 1 or greater, as well as performing all the traditional weatherization work. The project is currently estimated at a little more than 65 KW total of PV at a preliminary budget for the installed cost of roughly \$125,000 for the four buildings in the complex identified. Although OEO is interested in pursuing other DOE grant opportunities for such projects, OEO is also interested in pursuing the opportunity though the regular formula weatherization funds as well. OEO understands this could be a lengthy, multi-level application and approval process with many barriers for this type of pilot project. However, OEO wanted to include the language in this application so that the WV WAP may have the opportunity to move forward in looking into the feasibility of the opportunity, working closely with the WV DOE Project Officer and other DOE experts.

Other Renewable Energy Systems:

Assistance under the WAP may be provided for renewable energy systems. Any renewable energy system measures implemented by a Sub-recipient must have OEO written approval prior to work being performed. A site-specific Weatherization Assistant energy audit must be included as part of the client file which will be reviewed by OEO as part of the approval process.

10 CFR §440.18 (Allowable Expenditures) incorporates the renewable energy system provisions and specifies a ceiling of \$3000 per dwelling for labor, weatherization materials, and related matters, subject to annual adjustments. As per DOE WPN 15-1 Section 3.1.1, the percentage increase in the CPI for the previous 12-month period (October 2013 – September 2014) was 1.7%, so a 1.7% increase was applied to the PY 2014 adjusted average of \$3,486. The PY 2015 adjusted average for renewable energy measures is \$3,545 with a SIR greater than 1.

The adjusted average for renewable energy measures is not a separate average, but part of the overall adjusted average expenditure limit of \$7,105.

Because the total average cost per unit exceeds the renewable measures allowance, the major effects of the regulation are to provide criteria and a procedure for integrating renewables into the WAP, and to establish a process for evaluating petitions to use new or innovative renewable energy systems in the WAP.

Section 440.21(c)(1) specifies performance and quality standards criteria for renewable energy systems. Paragraph (c)(2) establishes a procedure for submission and action on

petitions by manufacturers requesting the Secretary of Energy to certify a new technology or system as an eligible renewable energy system.

Approved renewable energy systems will be listed in Appendix A of Part 440, Standards for Weatherization Materials.

V.5.2 Energy Audit Procedures

Unit Types	Audit Procedures and Dates Most Recently Approved by DOE
Single-Family	NEAT, 2011
Multifamily	 1-5 Units, individually heated/cooled, garden style apts - Priority List (2011) or NEAT audit with 3 or less stories Small MDU less than 25 units, individually heated/cooled - NEAT audit Sampling* MDU greater than 25 units – DOE Project Officer Approval
Mobile Home	MHEA, 2011

*Audit Sampling: To insure a true representation of the building, an audit(s) must be completed on apartments with different configurations and heat loss characteristics. (ex: 1 bed. bottom floor, 1 bed. middle floor, 1 bed. top floor, 2 bed. Bottom floor) an audit of at least 25% of the total number of units in each building must be conducted. Each audit must include photo documentation of existing conditions (ex, insulation levels, venting, etc.)

WV WAP uses the Weatherization Assistant software as its energy audit tool. The Weatherization Assistant energy audit software was developed by Oak Ridge National Laboratory specifically for the use for the Weatherization Assistance Program. There are two components to the Weatherization Assistant software: the National Energy Audit Tool (NEAT) for single family houses and the Manufactured Home Energy Audit (MHEA) for mobile homes.

OEO will be working during PY 2015 - 2016 to resubmit the Weatherization Assistant audit procedures for approval for use in the WV WAP for another five years starting with PY 2016 - 2017 as per 10 CFR 440.21 (i). OEO plans to have all documentation submitted to DOE by the end of calendar year 2015 to allow sufficient time for DOE to approve prior to the start of PY 2016 - 2017.

Each Sub-recipient must have at a minimum one certified energy auditor with a good working knowledge of NEAT and MHEA or an approved contract in effect with another Sub-recipient to perform energy audits. Some Sub-recipients have obtained the Home Energy Professional Energy Auditor certification, and OEO will continue offer the training and certification to Sub-recipients during PY 2014 – 2015 to improve and enhance the audit process.

For Multifamily Units, , until MulTEA is fully developed and implemented, OEO has a procedure in place (*Multiple Dwelling Unit Policy and Guidance*) implemented on February 25, 2011 that was developed with oversight and direction from a former DOE Project Officer as mentioned in *Section V1.2*. Multiple dwelling units are defined as buildings containing 5 units or more and can be weatherized if 66% (50% for duplexes and quadraplexes) of the occupants qualify for weatherization assistance pursuant to Federal Regulation 10 CFR 440.22. The majority of eligible units in West Virginia are considered to be primarily Garden Style Apartments, with less than 25 units per structure, 3 stories or less where the units are individually heated and/or cooled and have exterior access. Hence, these dwellings will be the focus of the WV WAP's Multi-family weatherization efforts. Each multifamily unit (including those that have less than 5 units) must meet the previously mentioned audit procedures and all other procedure and documentation requirements set forth in the WV WAP *Multiple Dwelling Unit Policy and Guidance*. Prior to commencing weatherization of the building, OEO must review and approve of the project. A minimum 25% audit sampling must be completed on apartments with different configurations and heat loss characteristics for each building to be weatherized.

Due to increased and more complicated requirements and procedures, any Multifamily project *greater* than 25 units would have to be submitted for review and approval to the DOE Project Officer prior to commencing weatherization.

V.5.3 Final Inspection

Quality Control Inspectors (QCI) working for, or contracted by, the WV WAP must possess the knowledge, skills and abilities in the National Renewable Energy Laboratory (NREL) Job Task Analysis (JTA) for Quality Control Inspectors. This applies to all individuals who perform an evaluation and sign off on work performed in homes, including Sub-recipient final inspectors and OEO monitoring staff.

Certified Sub-recipient QCI's are required to perform a final inspection of each dwelling unit before it can be reported as a completion. The final inspection must be performed by the certified QCI using the WV WAP mandated "QCI form" (attachment to application) and certify that the work has been completed in a professional manner and is in accordance with the priority determined by the audit procedures required by 10 CFR 440.21. To be in compliance with DOE WPN 15-4, during PY 2015 – 2016, only those who possess the Home Energy Professional (HEP) QCI certification may perform inspections and sign off on work performed in homes. All Sub-recipients but one have demonstrated QCI competency by receiving certification as an HEP QCI, and OEO anticipates the last Sub-recipient to receive the QCI certification prior to the start of PY 2015 – 2016.

The credentials of each Sub-recipient QCI are maintained in the database management system. OEO will review the system periodically to ensure QCI credentials remain up to date as well as during the annual monitoring process. OEO has set up all training and certifications of QCI staff (as described in Section V.8.4 Training and Technical Assistance Activities) thereby ensuring the

validity of all credentials. In the future, OEO will either set up any additional certifications for the network, or review and approve that the proper certification is sought and obtained and all procedures followed prior to reimbursement for any training/certification expenses.

As of September 15, 2011, OEO implemented a "QCI/Quality Assurance" form and associated policy. (The form was updated and resubmitted to the Sub-recipient Network March 28, 2014). The standardized form was based off of DOE's example of a quality assurance document, modified to meet the needs of the WV WAP. The form and the associated policy provide uniform guidelines and practices for final inspections of units at the Sub-recipient level, to ensure such are performed correctly and thoroughly prior to being submitted as a completed unit. OEO will ensure the form reflects SWS requirements. Signatures are required on the form certifying the unit had a final inspection and met all required standards. The Inspection includes and an assessment of the Weatherization Assistant audit performed and confirms that measures called for on the work order were appropriate signifying the proper Savings-to-Investment Ratio.

In regards to DOE WPN 15-4 compliance, OEO will ensure through the monitoring process described in *Section V.8.3 Monitoring Activities* that work performed by the Sub-recipient meets the criteria outlined in the SWS.

If during the monitoring process, it is discovered a Sub-recipient QCI is not inspecting units using the standards adopted by the State and consistent with the SWS, OEO will initiate a Quality Improvement Plan process with the Sub-recipient also described in Section V.8.3 Monitoring Activities. OEO will work with the Sub-recipient to identify the best course of action to address whatever deficiencies may exist in the Quality Control Inspection process including both internal steps a Sub-recipient can take as well as external training and technical assistance OEO can provide or obtain. Depending on the nature and severity of the issues found, OEO may take disciplinary or punitive actions including but not limited to the monitoring of any job a Sub-recipient is attempting to turn in as a completion, or disallowing of costs/completions and repayment of funds.

Due to staffing limitations of certain Sub-recipients, the WV WAP will have to institute a combination of the two DOE Prescribed QCI Policies of *Independent QCI and Independent Auditor/QCI*. Unfortunately not all Sub-recipients have the staff to have a separate Auditor and QCI. For such agencies, OEO will increase the monitoring efforts of completed dwelling units as per DOE WPN 15-4. For Sub-recipients that have an independent QCI, OEO will monitor at least 5% of completed dwelling units. For Sub-recipients that have an Auditor that also performs the functions of QCI, OEO will monitor at least 10% of completed dwelling units. This percentage will increase based on issues identified and/or capacity of OEO staff. OEO will work with the Sub-recipients and make all reasonable efforts with the funding available to train and certify enough staff to separate the Auditor and QCI duties at the Sub-recipient level where it is possible to do so. As stated in *Section V.8.4 Training and Technical Assistance Activities*, OEO will be offering additional QCI training and certifications as funding allows throughout the PY. Except for extremely extenuating circumstances, the QCI will not have performed any other

work on the completed dwelling unit; (there is currently one Sub-recipient with only two crew workers). OEO will utilize the monitoring process to ensure the integrity, impartiality, and quality of the inspection process.

V.6 Weatherization Analysis of Effectiveness

OEO performs a variety of analysis of the WV WAP of varying intensity, and on a range of levels (statewide, agency specific, objective/measure/process specific etc.) at different intervals throughout a program year. Program production, goal attainment, and expenditure rates are tracked on a monthly basis for each Sub-recipient at the State level on a statistical analysis tool. These statistics are analyzed periodically, and the appropriate technical assistance is provided to those Sub-recipients not meeting goals or benchmarks. The Sub-recipients use the same statistical analysis tool for tracking their own production and expenditures to further ensure routine evaluation of local programs and reevaluation of goals when necessary.

A monthly "Dashboard" outlining the status of the weatherization program statewide was developed by OEO and is submitted to the Network after all reports have been submitted, data reviewed, and funding requests approved. This spreadsheet displays a wide range of summary information including expenditure numbers, health and safety percentages, completion data, and average job cost. OEO developed supplemental spreadsheets to the "dashboard" which breaks down information in a more detailed manner. It provides a detailed line item breakdown of expenditures and average job cost. It also provides a comparison of actual activity verses estimated data the Sub-recipients submitted in the application for funding for the Program Year. It also displays dwelling type served and fuel type served for evaluative purposes.

During PY 2014 – 2015, OEO developed an analysis tool called the Master Agency Checklist (MAC). This comprehensive spreadsheet takes information from all of the other analysis tools that OEO utilizes, and compiles all of the data in one place. This tool encompasses all areas of compliance that OEO would utilize to evaluate a Sub-recipient in all components of the program: programmatic/administrative, financial, and field. This tool can be used to periodically evaluate the network on a multitude of parameters for identification of trends and areas of improvement, but could also be used for funding/territory award evaluation if WV WAP awards were to be framed in an RFP or other competitive process. OEO is currently utilizing data to test this tool and will continue to utilize this spreadsheet in PY 2015 – 2016.

OEO will establish production and expenditure benchmarks that will be included in the Subrecipient Grant Agreements to increase accountability and ensure proper program management.

The WV WAP utilizes the database management system to track all weatherization work performed on any dwelling. The database management system coupled with the aforementioned statistical analysis tool and other statistical spreadsheets will facilitate a review/analysis process essential for program management and oversight. The review process

will serve as a routine procedure to ensure compliance, as well as an initial monitoring process to confirm that measures are performed and tracked according to program standards, and that diagnostic and health and safety tests are performed and documented correctly. This process allows for the identification of trends that may convey a training or technical assistance need, or specific jobs that may need to be monitored due to documentation of measures.

As mentioned in the *State Plan Annual File*, the state is developing and implementing a system to estimate annual energy savings for all funding sources as per 440.14(c)(4). (Currently the system is only in place for one of the supplemental Utility Programs.) The process will entail utilizing data from the "Weatherization Assistant Recommended Measures Output Report." The WV WAP will then have the capability to compare productivity and associated energy savings data from the individual Sub-recipients and even have the capability to break it down by measure. There will need to be additional development of the database management tool to be able to utilize the capabilities effectively. OEO performs a review of the Weatherization Audit Tool usage by each Sub-recipient during monitoring visits to ensure material and fuel costs are up to date in the "Setup Libraries" ensuring the system is performing accurate cost effectiveness evaluation. OEO performed a sampling cost evaluation when implementing the audit system to ensure materials/measures had accurate costs associated.

As stated in section *V.8.3 Monitoring Activities*, OEO also tracks the most significant deficiencies of Sub-recipients in a "Root Cause Analysis" spreadsheet to evaluate and analyze trends of the Sub-recipients' performance over a period of several years. This analysis is another contributing factor to the identification of training and technical assistance activities and priorities. The collection and analysis of the data keeps OEO on a path of continuous improvement with regards to support, guidance, and oversight which in turn will keep the Sub-recipients on the same path regarding the weatherization services provided and management of the program.

During the monitoring process, OEO ensures that the Sub-recipient has an internal evaluative processes in place to facilitate improvement (ex. Quality Control Inspector) and ensure issues are addressed properly and in a timely manner. OEO ensures through the monitoring process that deficiencies are corrected through a Quality Improvement Plan process and follows up and verifies the correction through desk top and on-site follow-up visits as necessary.

V.7 Health And Safety

The WV WAP Health and Safety Plan is included as an attachment. A "Health and Safety/Incidental Repair Material Identification Chart" is also included as an attachment as part of the WV WAP Health and Safety Plan.

V.8 Program Management

V.8.1 Overview and Organization

The WV WAP is administered by the Office of Economic Opportunity (OEO). OEO is a division under the WV Department of Commerce. OEO WAP staff consists of an Administrator, an Assistant Administrator, and six monitoring staff including a Monitoring Coordinator. The Program is also supported by a Program Development Manager and a database Systems Specialist, as well as administrative staff. The WV WAP is overseen by the OEO Director with support from the Deputy Director. OEO also administers the Community Services Block Grant (CSBG), Emergency Solutions Grant and Housing Opportunities for Persons with AIDS (HOPWA), Low-Income Home Energy Assistance Program (LIHEAP) and LIHEAP Application Intake. An organizational chart is provided as an attachment. OEO is not responsible for the State Energy Program, which is administered by the WV Division of Energy, which is also an agency under the WV Department of Commerce.

The WV WAP is administered utilizing all applicable federal rules and regulations including 10 CFR Part 440 as well as any additional rules and regulations that come into effect due to the federal implementation of the OMB Circular 2 CFR 200 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200.); DOE specific regulations codified in Part 910 of 2 CFR and Department of Health and Human Services (HHS) specific regulations codified in Part 300 of 2 CFR; all applicable provisions of Treasury Circular Number 1075, and State of West Virginia Executive Order 12372 (Intergovernmental Review Procedure); and all other state rules and regulations that apply including WV Purchasing Procedures. The WV WAP also follows all DOE specific guidance as provided through DOE WPNs. The WV WAP incorporates these requirements into Sub-recipient Grant Agreements and any Memorandums of Understanding as well as into any operations manuals or guidance created.

V.8.2 Administration Expenditure Limits

For PY 2014 – 2015, the statutory 10% of administrative funds will be divided evenly between the Sub-recipients and OEO. The State will retain 5% of the grant for their administrative costs and 5% will be made available to program Sub-recipients, as per DOE guidance in DOE WPN 15-01.

As per DOE WPN 15-01: "A Pass-through entity may provide for Sub-recipients who receive less than \$350,000 of new DOE appropriated funds with permission, to use up to an additional 5 percent of their sub-grants for administration if the Pass-through entity has determined that such Sub-recipient requires the additional amount to effectively implement the administrative requirements of the Program." The WV WAP has eleven of twelve Sub-recipients that receive less than \$350,000 of new DOE appropriated funds and therefore OEO has allowed an increase to those Sub-recipients' administrative funds to 10% of each Sub-recipient allocation. Overall, the WV WAP will be below

the 15% allowable for administrative funds for these special cases with the WV WAP utilizing 12.12% of funds overall for Pass-through entity and Sub-recipient administrative expenses.

A separate budget category is permitted by DOE for financial audits. The cost of these audits was previously charged to the already over-burdened administrative cost category and sometimes resulted in financial audits of less than adequate quality. OEO is providing some relief to the Sub-recipients by allowing these charges to come off the top of the grant, if the Sub-recipients meet the threshold contained in 2CFR 200. These costs will be actual costs of the weatherization portion of the audit.

V.8.3 Monitoring Activities

Introduction

Monitoring is one of the most significant and intricate procedures undertaken by OEO. OEO must adhere to multiple funding bodies' guidelines as well as construct and adhere to state-specific guidelines and protocols structured in a way to facilitate successful and functional program management throughout the state of West Virginia. Monitoring is one of the many tools utilized by OEO in an effort to continually improve the capabilities and effectiveness of the various Sub-recipients. Monitoring is a systematic process of gathering and evaluating information, as well the physical visitation of sites, in order to support and assess the Sub-recipients and their programs in terms of performance, capacity, and compliance. As a pass through entity of federal dollars, OEO ensures that grant funds are expended in accordance with applicable law, including regulations contained in 10 CFR part 440; 2 CFR 200, 2 CFR 910 and 2 CFR 300; DOE WPNs, and other policies and procedures that DOE may issue. The WV WAP Monitoring Plan will include the following areas:

Approach

OEO will conduct a monitoring of each Sub-recipient at least once a year, provide a written report to the Sub-recipient, and maintain both electronic and physical files related to monitoring which are accessible to DOE during its monitoring visits. The monitoring tools utilized by OEO are based off of tools and templates provided by DOE through WPN 12-5 Updated Weatherization Assistance Program Monitoring Guidance and WPN 12-4 Weatherization Assistance Program Financial Management Training Toolkit. OEO is in the process of revising monitoring forms. OEO has obtained forms utilized by other states to seek out best practices and additions to OEO documents, and also is seeking any updated documents, guidance, or forms from DOE.

OEO will also conduct periodic off-site desk-monitoring utilizing the database management system used to track all weatherization work, at times coupled with the statistical management tool and related analytical spreadsheets used to track production, expenditures, and other performance indicators. This process will serve as a pre-monitoring activity as well as routine review and oversight as needed. The desk-monitoring activity is

utilized to confirm that measures are performed and tracked according to program standards, and that diagnostic and health and safety tests are performed and documented correctly. It is also used to ensure all documentation for a client and dwelling are maintained and completed properly and accurately. This process allows for the identification of trends that may convey a training need, or specific jobs that may need to be monitored due to documentation of measures. In PY 2013-2014, OEO greatly increased its desktop monitoring capabilities to increase efficiency and effectiveness as well as to reduce expenses. OEO will continue to use these enhanced capabilities for the current PY.

The monitoring performed by OEO will be broken down into three components which may be performed at different times if necessary and may have differing frequency depending on quality of Sub-recipient performance in each focus area. The monitoring will include the following focus areas and details:

Programmatic and Management Monitoring

- Sub-recipient Production Analysis and Review (ensuring benchmark and yearly goal completion)
- Financial/Administrative Components
- Inventory (Equipment and Materials)
- Warehouse
- Rolling Stock
- Eligibility processes and compliance
- Reweatherization compliance
- Database management system usage and reporting
- Rental unit/Multifamily documentation and process compliance
- Reporting and funding requests
- Client Files and related documentation
- Energy Audit documentation
- Health & Safety Components (Respirator tests/Safety meetings/LSW documentation/Warehouse & Vehicle Safety/Health and Safety percentage)
- Compliance with all OEO mandated forms, processes, and policies (ex. QCI form)
- Energy Education
- Training & Technical Assistance
- Procurement Practices
- Client Prioritization methods
- Utility (leveraged) fund usage, documentation, and reporting
- Insurance coverage
- Sub-recipient personnel qualifications/certifications and associated work performed
- Sub-recipient internal corrective action procedures (for reduction of deficiencies)

Field Monitoring

- Program Overview (Client File Review, Work Orders, documentation of measures etc.)
- Energy Audits (Process and Documentation Weatherization Assistant Libraries, inputs/usage, adherence to guidance etc.)
- Weatherization of Units (all work performed on dwellings HVAC, shell measures including insulation and air sealing, baseload measures etc.
- Health & Safety (HVAC, LSW compliance, mold/moisture, electrical etc.)
- Final Inspections/Quality Control process and documentation
- Client interaction and Client education process

Field monitoring incorporates all new DOE mandated regulations including ASHRAE 62.2-2013 (and any applicable updates when implemented), Zonal Pressure Diagnostic standards, and Combustion Appliance Zone testing compliance. Also, in compliance with DOE WPN 15-4, all field monitoring inspections will be performed by a certified HEP QCI and the monitoring inspection form will include a signature of the monitor(s), to supplement the client file and Sub-recipient QCI form.

Fiscal Monitoring

- Financial Policies and Procedures
- Cash Management
- Procurement policies and practices
- Financial management of Material Inventory
- Financial management of Property and Equipment
- Contracts/Sub-awards
- Payables/Receivables/Expenses Management
- Invoicing and Reporting accuracy
- Review of Funding Requests and specific line items/expenses for accuracy and proper documentation
- Bank records and reconciliation
- Financial Statements
- Lines of Credit
- Financial Management of utility (leveraged) funds
- Financial Audits (See below)

A-133 Financial Audits (2 CFR 200 Subpart F)

Sub-recipient A-133 audits are due to OEO within 9 months of the end of the Sub-recipient's fiscal year. If the deadline is not met, OEO sends the Sub-recipient a reminder notice in the mail using the "Audit Extension Request Language" letter and the "Audit Extension Request Form." Once a Sub-recipient

submits an extension request using the "Audit Extension Request Form", OEO will review for approval or disapproval. This form will be signed by an OEO authorized employee and emailed to the Sub-recipient Executive Director.

OEO will verify when the audit was submitted to the Federal Clearinghouse (FAC), and note this on the "Annual Audit Chart", maintained by the Fiscal Division of OEO. If the Sub-recipient did not submit the audit to the FAC by the deadline as per federal regulations, OEO mails a reminder letter to the Subrecipient.

The Fiscal Division will review all audits using the "OEO Pass-through entity Audit Review Checklist." A "Pass-through entity Audit Review Summary" is completed for the audit, and maintained on OEO's shared drive. Depending on the results of the review, OEO forwards to the Sub-recipient either (1) a letter indicating no findings or (2) a letter requesting a Corrective Action Plan (CAP). The Sub-recipient has 6 weeks to submit a CAP if applicable.

If a Sub-recipient has not submitted the CAP within the deadline, the CAP "Reminder Email" will be forwarded to the Executive Director. Upon receipt of the CAP, OEO will review and forward to the Sub-recipient either the (1) "CAP Acceptance Email" or (2) another correspondence requesting modification to the CAP. As per 2 CFR 200, as a pass-through entity, OEO is required to follow-up/issue a management decision for Federal award findings related to the programs OEO administers.

Monitoring Staff

Monitoring will be performed by several OEO staff members with differing credentials and areas of expertise to effectively monitor all of the various components of the WV WAP as outlined above. Monitoring staff members may monitor more than one component. The monitoring process and the different components are managed and overseen by a Monitoring Coordinator who may participate on different levels as needed throughout the process. The current OEO monitors are as follows:

Programmatic and Management Monitors (Administrative Monitors):

- 1 Weatherization Administrator
- 1 Weatherization Assistant Administrator
- 1 Weatherization Specialist (Program/Field)
- 1 Program Development Manager
- 1 Weatherization Systems Specialist

Qualifications: The qualifications of the Programmatic and Management Monitors (Administrative Monitors) include extensive experience with the weatherization program (both at the Pass-through entity level and Sub-recipient level) as well as certifications and education

that benefit the monitoring team as they oversee and evaluate the Sub-recipient management of the weatherization program. The staff members have experience in management and finance/accounting. The certifications range from Building Performance Institute (BPI) certifications including HEP QCI, Results Oriented Management and Accountability (ROMA) certification, Masters of Business Administration (MBA), and multiple WV WAP specific certifications (e.g. WV WAP Quality Control Inspector Certification, WV WAP HVAC Systems Inspection Certification, Weatherization Assistant Training Certificate) as well as attendance at regional and national energy conferences.

Field Monitors (Technical Monitors):

- 2 Weatherization Specialists (Field)
- 1 Weatherization Specialist (Program/Field)

Qualifications: The qualifications of the Field Monitors (Technical Monitors) include extensive experience with the weatherization program as well as extensive building science knowledge. The Field/Technical monitors have several BPI certifications (including HEP QCI), Weatherization Assistant Training Certificate, as well as multiple WV WAP specific certifications (Energy Auditor, Quality Control Inspector, multiple HVAC certifications) as well as attendance to regional and national energy conferences. As previously stated, all field monitoring inspections will be performed by a certified HEP QCI at the Pass-through entity level.

Fiscal/Financial Monitors:

- 1 Fiscal Monitor
- 1 Weatherization Assistant Administrator
- 1 Program Development Manager

Qualifications: The qualifications of the Fiscal/Financial Monitors include education (bachelor's and master's level) and experience in the accounting, finance, and management fields, as well as knowledge of federal financial requirements. Some of the monitoring staff experience is specifically with the Weatherization Assistance Program both on the Pass-through entity and Sub-recipient level. The Fiscal/Financial monitors will also utilize OEO's CFO and experienced accounting staff as additional resources during the monitoring activities as needed.

OEO staff have received 2 CFR 200 Uniform Guidance training and will continue to seek additional training on the new regulations. OEO will pursue additional certifications as identified and/or needed as the Program Year progresses.

Monitoring Expenditures:

All monitoring staff members will be paid out of the T&TA budget category with the exception of the Monitoring Coordinator and the Fiscal Monitor who will be paid out of the Administrative budget category given the nature of their work in relationship to the organization and other programs they work within. The estimated percentage of T&TA funds directed toward this

effort is 53%. OEO has budgeted \$11,165 out of DOE funds for travel expenses related to monitoring activities. These funds will be supplemented by LIHEAP funds.

Monitoring Schedule:

The monitoring schedule will follow a basic plan of one or two programmatic, field, and fiscal monitoring performed per month for the 12 Sub-recipients. This varies throughout the year due to when OEO starts the monitoring process for the PY, also considering holidays, Sub-recipient leave time, etc; therefore some months have one visit, and some have two. OEO avoids scheduling visits during back-to-back weeks when possible so that OEO can work to finalize reports and adequately prepare for the next visit. This plan is only tentative as visits to a Sub-recipient could increase if there are serious deficiencies identified. The scheduling of the Sub-recipients will depend in part of when their last visit occurred as well as reasonably taking into consideration geographic location and time of the year. Also, any Sub-recipients that had major or repeated deficiencies identified from the PY 2014-2015 monitoring process and have not had a follow-up visit (due to deficiencies being identified toward the end of PY 2014-2015); these Sub-recipients will be first priority in PY 2015-2016, with additional reviews scheduled as necessary until deficiencies are corrected.

Visit

The staffing and credential make up of a Sub-recipient will determine the number of completed dwelling units needing to be visited by OEO as per DOE WPN 15-4. For Sub-recipients that have an independent QCI, OEO will monitor at least 5% of completed dwelling units. For Sub-recipients that have an Auditor that also performs the functions of QCI, OEO will monitor at least 10% of completed dwelling units. This percentage will increase based on issues identified and/or capacity of OEO staff. OEO will also review units "in progress" beyond the 5 or 10 percent completed units respectively, in order to assess: quality and compliance; appropriate and allowable materials; appropriateness and accuracy of energy audits; final inspections; safe work practices, such as lead safe weatherization protocols; and other factors that are relevant to on-site work.

An important continued focus of WV WAP Sub-recipient monitoring for the PY 2015-2016, will be the supplemental components to the Weatherization Program, including but not limited to the utility partnership programs, and LIHEAP components including the Energy Crisis Intervention Program, the Electrical Upgrade Component, and the Weatherization Related Home Repair Component. These projects provide additional funding for the WV WAP, enable additional work to be done on a large percentage of weatherized homes, and make possible the weatherization of some homes that may have had to be deferred because of necessary repairs that are outside the scope of the DOE WAP. OEO will also monitor any other components that are developed and approved as additional appropriate LIHEAP measures including but not limited to Healthy Homes Pilot Projects. Monitoring of the supplemental components will be part of the standard monitoring process (unless determined necessary to do otherwise) focusing on the correct utilization, tracking, and accountability of the supplemental component

funds. OEO will take advantage of desk-top monitoring opportunities as appropriate for additional components of the WV WAP.

Upon the completion of each monitoring visit of any of the three components, an exit conference is held between the members of the Sub-recipient (as selected by the Sub-recipient management) and the monitoring team to discuss strengths, weaknesses, findings, trends for concern, and monitor recommendations. As per DOE WPN 12-5, within 30 days after each visit, OEO will prepare a written report for the Sub-recipient that describes the current monitoring assessment (identify any findings, concerns, recommendations, commendations, and best practices) and any corrective actions as part of a Quality Improvement Plan, if applicable. A draft of this report is provided during the Exit Conference and then finalized by OEO staff following the visit. A Sub-recipient typically has 30 days to respond with a Quality Improvement Plan unless the nature and severity of findings deem a more expedient response. If the Sub-recipient does not respond within the required time limit, the Sub-recipient is notified and disciplinary or punitive actions may be taken if necessary.

Process of Corrective Action, Discipline and/or Removal of a Sub-recipient from the Program

OEO has a system in place to review each Quality Improvement Plan provided by the Subrecipients either approving of the plans made or requiring additional information or actions. Regardless of monitoring focus, OEO follows up with each Sub-recipient to ensure that the corrective actions outlined in the plan have been implemented either through a subsequent monitoring visit and/or desk-top review, or requiring the submission of documentation confirming the corrections.

OEO increases visits (both the number of units reviewed and the frequency of monitoring visits) to the Sub-recipient until it can be assured deficiencies are resolved. If necessary, OEO has implemented a system of monitoring every potential job prior to submission as a completion for an agency if sustained compliance cannot be demonstrated. If Health and Safety issues that present imminent danger to people in the house are found during a visit, OEO requires the Sub-recipient to immediately resolve the issues. Sub-recipient noncompliance or repeated unresolved findings (based on a minimum of 2 monitoring visits at a Sub-recipient) will be reported to the DOE Project Officer. Sensitive or significant noncompliance findings, such as waste, fraud, or abuse must be reported to DOE immediately, by OEO.

Once the deficiencies are corrected and procedures are put in place to prevent reoccurrence, OEO will resume the original percentage sampling of that particular Sub-recipient's work in subsequent monitoring visits.

Depending on the issues and the severity of the finding(s) OEO will:

- Continue to monitor and review the progress of the Sub-recipient on the specific issues;
- Provide training and technical assistance as needed; and
- Assist the Sub-recipient in any way possible to resolve these issues.

If repeated monitoring and training do not correct the issue, OEO will begin the process of disciplinary action and/or the removal of the program from the Sub-recipient. Depending on the type of issue, and whether programmatic, fiscal, or field, disciplinary action may include but is not necessarily limited to:

- Withholding disbursement of grant funds until non-compliance issues are corrected;
- Disallowing questioned costs;
- · Reimbursement of questioned costs to Pass-through entity;
- Disallowing completions that do not meet DOE program standards;
- Placing the Sub-recipient on an "At Risk" status;
- The Sub-recipient voluntarily relinquishes the program; and
- Removing part or all of the program from the Sub-recipient.

Tracking & Analysis

The Sub-recipient monitoring process from notification to final approval and confirmation of corrective actions is tracked by OEO to final resolution in a "Monitoring Log." OEO also tracks the most significant deficiencies in a "Root Cause Analysis" spread sheet to evaluate and analyze trends of the Sub-recipients' performance. This process allows for the identification of training and technical assistance needs and is an evaluative tool used to keep both OEO and the Sub-recipients on a path of continuous improvement. The results of the monitoring efforts also get pulled in the "Master Agency Checklist" for comprehensive evaluative purposes as discussed in *V.6 Weatherization Analysis of Effectiveness*.

V.8.4 Training and Technical Assistance Approach and Activities

The state's Training and Technical Assistance (T&TA) funding is used to pay salary, travel, and operational costs for OEO staff to provide monitoring/T&TA to Sub-recipients. Sub-recipient expenses for participation in T&TA activities (including special conference attendance) will be funded from DOE T&TA and/or other funds including LIHEAP. T&TA activities are intended to maintain or increase the efficiency, quality, and effectiveness of the Weatherization Program at all levels and are designed to maximize energy savings, minimize production costs, improve program management and field "quality of work," and/or reduce the potential for waste, fraud, abuse, and mismanagement.

The state assesses training needs regularly as part a constant process as the Program Year progresses. This process and the related training plan are flexible and OEO incorporates information from the process into the training plan as needed. OEO assesses T&TA needs of its Sub-recipients through:

Pass-through entity Monitoring efforts

- Internal Trend analysis
- Biannual Training Needs Assessment Surveys
- Communication with national experts regarding new technologies and/or standards/practices
- Communications with DOE Project Officer
- Guidance as provided by the Department of Energy (DOE) including industry-wide initiatives and future program requirements (certifications, health and safety implementation etc.)
- Monitoring visits from the DOE Project Officer, DOE contracted representatives, or the Office of Inspector General

Overview

The WV WAP has made an important transition with regards to trainings provided to the Subrecipient network over the most recent Program Years. Trainings and certifications have and will continue to be provided by Interstate Renewable Energy Council (IREC) accredited and certified Weatherization Training Centers (WTC) within close proximity to WV. OEO and New River Community and Technical College is currently pursuing the possibility of becoming an Building Performance Institute (BPI) accredited test site where IREC accredited trainers and proctors would be contracted to train and certify Home Energy Professionals in all four major categories which is currently offered by BPI.

In PY 2014 - 2015, the major training priority was to ensure that all program personnel (Passthrough entity and Sub-recipient) performing inspections on completed dwelling units were HEP QCI Certified. As of January 1, 2015, eleven of the twelve Sub-recipient weatherization providers have at least one HEP QCI Certified staff, and several have more than one. Training and certification will be provided to the remaining Sub-recipient before July 1, 2015.

The major areas of focus this year and next year for training are: implementation of the final form of the Standard Work Specifications (SWS) functioning as the WV State Weatherization Standards/Field Guide; re-certification of all HVAC Technicians and re-certification of Energy Educators. Additional training consisting of New Hire Requirements and Healthy Homes Specialists will also be made available. OEO will also continue to offer HEP Energy Auditor (EA) training and certification as funding allows, as well as additional HEP QCI training and certifications as necessary for more efficient and effective implementation of the WAP on the Sub-recipient level.

Descriptions:

State Weatherization Standards (Tier 1)

The final product of the State Weatherization Standards will be distributed by OEO at a statewide meeting with the Sub-recipient Weatherization Network, held in May 2015. Training

will be provided on what it contains and how it is to be utilized. OEO will document the verification of receipt of the final product by the Sub-recipient as required by DOE WPN 15-4. Follow-up trainings consisting of on-site T&TA and webinars will be conducted as West Virginia continues to implement the SWS into the program.

HVAC Technician Certification (Tier 1):

During the next two years, OEO will be re-certifying the Sub-recipient HVAC Technicians. OEO has recently revised the structure of the certification utilizing course offerings of IREC WTCs. A series of four (4) classes conducted by IREC WTC will be offered to staff that repair or replace heating systems in client homes. Sub-recipient staff that repair or replace heating systems must take and pass all four classes to be certified to work on heating systems in the WV WAP.

The mandated classes for HVAC Technician Certification are:

- HVAC Fundamentals
- Heating Unit Inspection (HUI)
- Heating Technician (HT)
- Heat Pump / Air Conditioners (HP/AC)

Sub-recipients will have until September 30, 2016 to have at least one person HVAC Technician certified. OEO is mandating that HVAC certifications are renewed every three (3) years. Until now, there was not a standardized curriculum that was always practiced/maintained or time limit on re-certification of HVAC Technicians.

Client Education (Tier 2)

Energy Education is one of the most important weatherization processes to ensure the maximum effectiveness of the weatherization measures. Each Sub-recipient has identified at least one Energy Educator. This year, OEO will be recertifying all Energy Educators through online training provided by an IREC accredited WTC. This course is designed to assist the student in acquiring adult education skills to establish an effective means of communication between the Energy Educator and the client. The on-line Client Education course prepares students to develop a strategy for effective client education from pre-approval to quality assurance. Videos and documents are presented to use with clients to ensure that they get the information they need during the client education process. After each topic is presented, a short self-quiz follows each section and feedback is given. A final test consisting of a single multiple choice-true/false exam is given at the end of the course. To be certified, the student must pass this final exam. After passing the certification test, the Energy Educator will work with clients to affect change in poor energy conservation habits.

The Energy Educator utilizes a tabletop easel with energy saving tips and maintenance tips for weatherization measures. The process is intended to be interactive between the Energy Educator and client. A key element of the process is a "contract" called the Energy Savers

Partnership Plan, where the client agrees to do certain actions to conserve energy in their home. WV WAP has also received materials and guidance from utilities partners to improve the client energy education process.

New and re-certifications will be completed by September 30, 2015. After that time, Energy Educator Certification will be on an as needed per person basis. An Energy Educator must renew their certification every five (5) years.

New Hire Requirements (Tire 2)

OEO has designed a curriculum of on-line courses and videos, as a requirement for all new hires at the Sub-recipient level for the WV WAP. This set of trainings will introduce a new employee to the WAP familiarize them with the program and process. Each new hire will be required to complete all courses during the first six (6) months of employment. These trainings are designed as an introduction to the job of the retrofit installer technician which is the entry level position in the weatherization field, and provide a basic understanding of the WAP. These trainings will give students an overview of what is expected of a retrofit installer technician on the job site, knowledge of the use of the basic tools of weatherization, and an understanding of basic building science.

The following is a listing of the courses for a new hire retrofit installer technician:

- "This is the World of Weatherization" video
- Retrofit Installer Technician on-line course
- Blower Door Basics: Part 1 Prep & Setup WxTV
- Blower Door Basics: Part 2 The Test Process WxTV
- Blower Door Basics: Part 3 The Breakdown WxTV

These courses will be available all year as an as needed basis for current "new" Sub-recipient staff, or additional crew staff that are hired this PY.

Healthy Homes Specialist (Tier 2)

It has long been known that there is a connection between health and housing. The DOE Weatherization Plus Health initiative is a national effort to enable the comprehensive, strategic coordination of resources for energy, health, and safety in low-income homes. Currently, a portion of the DHHR LIHEAP funds are being used to fund several Healthy Homes Projects, enabling Sub-recipients to take a holistic approach to identify and resolve problems that threaten the health and well-being of residents in low-income homes. OEO made training and certification of a Healthy Homes Specialist available to all Sub-recipients (and several OEO staff) two years ago. Healthy Homes Specialists must renew their certification every two (2) years and therefore OEO will be working with Sub-recipient staff to ensure the certifications are retained during this PY.

OEO is looking into the opportunity to offer Healthy Homes Specialist Continued Education Credits (CEUs) during the West Virginia Community Action Partnership statewide conference in May 2015, and will also offer other CEU opportunities for staff to retain the Healthy Homes Specialist certification throughout the PY. Healthy Homes training opportunities will be funded as an allowed component of OEO's LIHEAP-WX funding as approved by WV DHHR.

HEP QCI/HEP EA (Tier 1)

As previously mentioned, OEO will be offering additional HEP QCI training and certification opportunities as well as HEP EA training and certification as funding allows. OEO understands that some Sub-recipients need more than one certified QCI due to size, service territory and jobs needed completed, and/or crew make-up. OEO also encourages Sub-recipients to pursue the HEP EA certification even though it is not yet a requirement due to the value of the knowledge and certification given the importance of the position to a strong program. OEO will also fund opportunities during PY 2015 – 2016 for Pass-through entity and Sub-recipient staff to retain their current HEP certifications by obtaining CEUs.

Approach

This year, OEO is taking a different approach to providing Tier 1 and Tier 2 trainings. OEO does not anticipate as much need for single training classes always consisting of large numbers of students. Instead, OEO is pursuing an "as needed, per person" approach as Sub-recipients anticipate hiring new staff throughout the year, and current certifications and licenses expire at different times throughout the year. Also, there is less of a need for certified staff in certain positions as Sub-recipients are now just fulfilling needs for additional staff, already having some with recent certifications. (ex. EA, QCI)

OEO will make available Tier 1 and Tier 2 trainings to the weatherization network during the entire year. Sub-recipients have requested more flexibility in scheduling training when needed in order to better accommodate for production. Instead of a series of set classes, which at times takes crews away from production for a longer period of time which could put a burden on an organization, Sub-recipients will have the ability to fit trainings into their schedule. OEO will set a time frame for when all Sub-recipients will need certain certifications completed to continue operating the WAP and ensure agencies plan and meet expectations during the year. OEO also tracks all required licenses needed by Sub-recipients to properly perform work within the WV WAP (WV HVAC Electrician License, WV Single Family Dwelling Electrician License, EPA Section 608 Refrigerant Transition Technician Certification, HVAC Contractor License etc.) and OEO will ensure all Sub-recipients remain current with all WV WAP required licenses.

Trainings planned this program year will be a combination of Tier 1 and Tier 2, primarily provided by IREC accredited Weatherization Training Centers as previously mentioned. Training will also be provided as determined by the various assessment and analysis methods mentioned throughout the State Plan. Attendance for all Tier 1 and 2 trainings is mandatory for

the appropriate program personnel unless otherwise approved by OEO due to extenuating circumstances.

OEO has implemented a Sub-Recipient Training Request and Reimbursement Policy, which establishes uniform guidelines for internal OEO documentation and tracking of training, technical assistance, workshops, certifications, and licenses within the WVWAP as well as the funding or reimbursement process for said trainings, as applicable.

Trainings will be determined through assessment, monitoring, internal analysis and requests from Sub-recipients. All requests for training from Sub-recipients will be submitted utilizing the OEO website (www.oeo.wv.gov) by submitting a "Sub-recipient Training Request Form."

Trainings will be presented in various venues and settings including traditional classroom settings, on-site/hands-on opportunities, and online/web based sessions.

Training Time Line for the PY 2015 – 2016

First Quarter - July 1 through September 30, 2015

During the first quarter of the PY, a combination of funding will be utilized for T&TA. DOE funding will be used, however, LIHEAP funding will also be used for training costs, as approved by WV DHHR, WV's LIHEAP Grantee. The combination funding will support the following trainings:

- HVAC Fundamentals (Tier 1)
- Energy Educator (Tier 2)
- HEP Quality Control Inspector (Tier 1)
- Healthy Homes Specialist CEUs/Recertification (Tier 2)
- Heating Unit Inspection (Tier 1)
- Initial Lead Renovator Certification (Tier 1) (if needed)
- New Hire Requirements (Tier 2)
- HEP CEUs

Second Quarter & Third Quarter - October 1 through December 31, 2015 & January 1 through March 30, 2016*

- HVAC Fundamentals (Tier 1)
- Heating Technician/Installer (Tier 1)
- Heating Unit Inspection (Tier 1)
- Energy Educator (Tier 2)
- Healthy Homes Specialist CEUs/Recertification (Tier 2)
- Initial Lead Renovator Certification (Tier 1) (if needed)
- Heat Pump /Air Conditioners (HP/AC) (Tier 1)

- Lead Renovator Refresher Recertification (Tier 1)
- New Hire Requirements (Tier 2)
- HEP Quality Control Inspector (Tier 1)
- HEP Energy Auditor (Tier 1)
- HEP CEUs
- Optional if needed: Weatherization Assistant 8.9 Roundtables (Tier 2)

Fourth Quarter - April 1 through June 30, 2016

The Final Quarter activities will continue with trainings and certifications on an as-needed, per person/Sub-recipient basis. A major focus will be insuring that all Sub-recipients are trained to meet the deadline for HVAC Technician by September 30, 2016.

Credentials/Certifications

OEO places great emphasis on maintaining workforce credentials for both Pass-through entity and Sub-recipient staff and build upon such credentials. Credentials, certifications, and certificates are all tracked for Pass-through entity and Sub-recipient staff in the database management system. Credentials, certifications, and certificates are reviewed and training, continuing education, re-testing etc. is planned and performed as necessary to ensure Pass-through entity and Sub-recipient staff maintain all necessary credentials.

OEO has implemented an internal Standard Operating Procedure-WV WAP Training Policy to establish uniform procedures for documentation and tracking of certifications, licenses, training, technical assistance and workshops within the WV WAP, as well as the funding or reimbursement process for said trainings as applicable.

OEO Weatherization Specialists must maintain proficiency on new methods and techniques pertinent to the Weatherization Program. OEO Weatherization Specialist staff must maintain levels of knowledge aligned with the Weatherization Industry as well as State and National Standards, and are also furnished with all State and Federal regulations as they are updated and released. At this time, two OEO Weatherization Field Specialists are BPI Certified with Building Analyst and Envelope Professional certifications. One field specialist has an additional BPI Manufactured Housing Certification. Two OEO Weatherization Field Specialists are currently certified as HEP QCIs, with the third Weatherization Field Specialist needing to retake only the written part of the exam for certification. This Field Specialist is currently on extended leave, and upon return will retake the written exam for HEP QCI Certification.

^{*}An assessment of the success of Quarter 1 training, regarding scheduling and implementation efforts will determine the objectives for Quarters 2 & 3, which is why the Quarters are combined at this time.

The WV WAP understands the direction that the DOE WAP is moving with regards to the requiring of national certifications. The WV WAP participated in the NREL/BPI Pilot program that was implemented in partnership with WAP and DOE. The WV WAP had workers tested on QCI Certifications as well as EA Certifications. As funding allows, the WV WAP will continue to pursue HEP Certifications for our Sub-recipient workers as the incorporation of DOE WAP curricula, certifications, and standards has been incorporated into HEP Certifications. OEO feels the partnership between DOE/WAP and NREL/BPI is a great step toward standardization of the weatherization and energy efficiency industries.

Due to funding and time constraints, OEO understands that it will not be possible to get all Sub-recipient staff HEP certified for each position in this Program Year. However, as outlined above, WV WAP will incorporate the EA into WV WAP requirements and will add additional HEP certifications in subsequent years. In order to be certified at a particular position in the WV WAP, the person must attend the IREC accredited certification training and be able to pass the written test and field test as applicable. The following are the current defined WV WAP certifications:

- 1. HEP EA Certification
- 2. HEP QCI Certification
- 3. Energy (Client) Educator Certification
- 4. Environmental Protection Agency (EPA) Accredited Lead Renovator Certification (and Recertification as applicable)
- 5. HVAC Technician Certification

The following certifications will be required in the near future for the respective weatherization staff positions in addition to the certifications listed above:

- 1. HEP Retrofit Installer Technician Certification
- 2. HEP Crew Leader Certification

In addition to the HEP level certifications and other required certifications, the WV WAP will periodically offer licensing testing through the State Fire Marshal's Office, the WV Contractors Licensing Board, as well as EPA certification testing venues for the following:

- 1. WV HVAC Electrician License
- 2. WV Single Family Dwelling Electrician License
- 3. EPA Section 608 Refrigerant Transition Technician Certification
- 4. HVAC Contractor License

All Weatherization Programs must also have a WV Residential Contractors License at the Subrecipient level, obtained through the WV Contractors Licensing Board.

Special projects are constantly being undertaken to ensure that the WV WAP keeps up with state-of-the-art energy conservation and management techniques. The following are other

additional Tier 2 trainings that will be offered throughout the year as needed, especially with regards to the implementation of the WV WAP Health and Safety Plan:

- 1. ASHRAE 62.2 -2013
- 2. Combustion Appliance Zone (CAZ) training
- 3. Lead Safe Work Practices Training
- 4. Healthy Homes Pilot Training
- 5. Weatherization Assistant Training
- 6. Duct Blaster
- 7. Infrared Camera Training
- 8. Database Management Training
- 9. Utility Program Training
- 10. Administrative/Programmatic/Financial Training
- 11. WV WAP Policy and Procedure Training

There are certain trainings (Tier 1 and 2) that are mandatory in order to be in compliance with rules and regulations in performance of the WAP. At this time, each Sub-recipient must have a certified QCI in order to perform those functions. As other DOE mandates additional certifications, trainings will be made available to the Sub-recipients for compliance.

If a Sub-recipient does not have such due to losing an employee or another circumstance, then attending one of those trainings would be mandatory or the functions must be contracted out to a Sub-recipient with certified staff. There is also a requirement that each Sub-recipient has a certified EPA Lead Renovator on staff as well as staff that have attended periodic mandatory trainings regarding new requirements with health and safety related measures (ASHRAE/CAZ etc.) Also, after September 30, 2016, HVAC work will not be performed by Sub-recipient staff that does not have the proper HVAC Technician certification.

Non-compliance with regards to any mandatory training without the written approval from OEO due to extenuating circumstances could result in a Sub-recipient not able to perform certain functions with their staff until the requirements are met.

There are no certification requirements imposed by OEO of Sub-recipient staff prior to hire, however as previously mentioned OEO is instituting a set of "courses" for newly hired crew personnel. If a new hire is to perform any functions that require a specific certification previously mentioned, (QCI, HVAC etc.) then the certification must be obtained before any related work is performed.

Technical Assistance

The WV WAP will continue to utilize the traditional approaches of on-site program, administrative, fiscal, and in-field technical assistance based on monitoring findings and/or needs of particular Sub-recipients. T&TA activities are intended to maintain or increase the

efficiency, quality and effectiveness of the Weatherization Program at all levels. Activities will be designed to maximize energy savings, minimize production costs, improve program management and crew/contractor "quality of work," and/or reduce the potential for waste, fraud, abuse and mismanagement.

As previously mentioned, OEO has issued an internal Standard Operating Procedure, WV WAP Training Policy, to establish uniform guidelines for internal OEO identification, execution, documentation, and tracking of technical assistance activities. Training and Technical Assistance is a vital responsibility of the OEO and must be adequately tracked, documented, and reported.

Technical assistance will continue at this time to be provided by State Weatherization Specialists. The Weatherization Specialists also perform Sub-recipient monitoring, so their familiarity with each Sub-recipients operation enables focused attention to specific technical assistance needs of particular Sub-recipients. The combination of monitoring report findings, discussions at staff meetings, peer exchanges, Sub-recipient feedback, and research of state-of-the-art energy conservation techniques all help determine the focus of the technical assistance.

Energy Savings:

As mentioned in the *State Plan Annual File*, the state is developing and implementing a system to estimate annual energy savings for all funding sources as per 440.14(c)(4). (Currently the system is only in place for one of the supplemental Utility Programs.) The process will entail utilizing data from the "Weatherization Assistant Recommended Measures Output Report." The WV WAP will then have the capability to compare productivity and associated energy savings data from the individual Sub-recipients and even have the capability to break it down by measure. There will need to be additional development of the database management system to be able to utilize the capabilities effectively. This data will contribute to identifying areas of training or technical assistance needed for the work being performed in the field.

Pass-through entity Assessment:

Training needs have been identified and are continuously evaluated. The first priority is providing trainings to be in compliance with any new DOE regulations or guidance. After that is met, then trainings are scheduled by the greatest need; i.e. the number of Sub-recipients that need a particular training. At the same time, OEO will evaluate how many HEP certifications have been obtained to be in compliance, and how many more could be obtained with available funding. OEO will assess on a quarterly basis both the needs of the Sub-recipients as well as funds that are available to meet those needs and will plan accordingly.

V.9 Energy Crisis and Disaster Response Plan

V.9.1 Energy Crisis

The WV WAP utilizes LIHEAP WAP funds to operate the Energy Crisis Intervention Program (ECIP). The intent of ECIP is to provide emergency heat during the winter heating season. The program addresses non-operable or severely malfunctioning and unsafe heating systems. Any household that is eligible for WAP is eligible for ECIP services. Any household that receives the emergency heating system repairs or replacements from ECIP must apply for regular WAP services. ECIP provides emergency assistance within 72 hours to insure the household will have heat. Weatherization services will be provided by the end of the program year, unless conditions exist that deems the dwelling ineligible for weatherization services at that time. During the LIHEAP-WX application and award process, the Sub-recipients were provided updated ECIP guidance for 2015.

V.9.2 Disaster Response Plan

The WV WAP Disaster Response Plan is addressed in Section V.1.2 Approach to Determining Building Eligibility (#7) and is in accordance with DOE WPN 12-7 Disaster Planning and Relief and all applicable federal regulations.



West Virginia Weatherization Assistance Program

State of West Virginia
Office of Economic Opportunity

PART II - ANNUAL FILE
PY 2015 - 2016



State of West Virginia Office of Economic Opportunity

U.S. Department of Energy Program Year: 2015 - 2016 State Plan Annual File

IV.1 SUB-RECIPIENTS

Due to the amount of information needed, this section is provided as an attachment.

IV.2 WAP Production Schedule:

	Average Unit Costs, including Re-weatherization, Subject to DOE Program	n Rules
	VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)	
A.	Total Vehicles & Equipment (\$5,000 or more) Budget	\$0
B.	Total Units Weatherized	261
C.	Total Units Re-weatherized	0
D	Total Dwelling Units to be Weatherized and Re-weatherized (B+C)	261
E.	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0
	AVERAGE COST PER DWELLING UNIT (DOE RULES)	
F.	Total Funds for program Operations	\$1,515,607
G.	Total Dwelling Units to be Weatherized and Re-weatherized (from line D)	261
Н.	Average Program Operations Costs per Unit (F divided by G)	\$5807
I.	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0
J.	Total Average Cost per Dwelling (H plus I)	\$5807

Total Units (excluding re-weatherized): 261

Re-weatherized Units: 0

IV.3 ENERGY SAVINGS

The West Virginia Weatherization Assistance Program (WV WAP) will utilize the WAP algorithm to calculate projected energy savings for the purpose of this application. The estimated energy savings for PY 2015-2016 is 7,960.5 MBtu.

The State is developing and implementing a system to estimate annual energy savings for all funding sources as per 440.14(c)(4). (Currently the system is only in place for one of the supplemental Utility Programs.) The process will entail utilizing data from the "Weatherization Assistant Recommended Measures Output Report." The WV WAP will then have the capability to compare productivity and associated energy savings data from the individual Sub-recipients and even have the capability to break it down by measure. There will need to be additional development of the database management tool to be able to utilize the capabilities effectively.

Energy Savings		
DOE Program	Amount	Line
Total DOE State Weatherization Allocation	\$2,668,468	(a)
Total Cost associated with Administration, T&TA, Financial Audits, and		
Insurance	\$1,152,861	(b)
Subtract the amount entered in line (b) from line (a), for a total Federal		
(DOE) funds available to weatherize homes	\$1,515,607	(c)
State Average Cost per Home	\$5807	(d)
Divide the amount entered on line (c) by the amount entered on line (d),		
for Total Estimated Homes to be Weatherized	261	(e)
Multiply (e) by 30.5 MBTU for Total Annual Estimated Energy Savings		
resulting from DOE appropriated funds	7960.5	(f)

The PY 2015 – 2016 energy saving calculations uses the most recent Metaevaluation of the National Weatherization Assistance Program (ORNL/CON-493).

IV.4 DOE-Funded Leveraging Activities:

WV WAP plans to continue to actively pursue non-Federal resources to supplement the Program, especially with post-ARRA funding reductions, through the development of leveraging projects and partnerships. The WV WAP expects at least a dollar return for every dollar invested in leveraging project activity. Weatherization leveraging activities in WV WAP since 2002 have consistently and successfully produced a greater number of dollars leveraged than expended every year on leveraging activities.

OEO will have a staff member that will continue to participate in leveraging activities. For PY 2015 - 2016, OEO plans to utilize **0.11% (\$3,000)** of the annual formula DOE allocation for leveraging activities.

Planned activities will include the following objectives to increase the scope of weatherization services to low-income West Virginia households:

- Continued facilitation in the development of utility/WAP projects and partnerships, including representation as needed with activities in the West Virginia Public Service Commission. OEO staff will continue to be involved in technical assistance, planning, and rules development of any negotiated projects or partnerships. Expansion or altering of certain weatherization-utility partnership activity may be negotiated between the utility companies and the local weatherization providers, with OEO made fully aware of any changes made in this manner.
- Continued facilitation of the expansion of potential Sub-recipient leveraging activities by:
 - Assisting Sub-recipients and West Virginia Community Action Partnership (WVCAP) through the negotiation of partnerships, agreements, and other arrangements;
 - Presentation of arguments and associated activities before state or local agencies, as contained under Section 142 of the Energy Policy Act of 1992 (amended in 2005) and providing training and technical assistance support to WVCAP and Sub-recipients as part of their active participation in utility rate proceedings and process in West Virginia; and
 - Continued contact with both the utility industry and the private energy service company network
- Continue to provide support and leadership to Sub-recipients and WVCAP offering tools and resources to assist in weatherization outreach, possibly including fall Energy Awareness activities. Such potential activities may involve:
 - Support in holding leveraging-related meetings;
 - Preparation of statewide weatherization statistical documents;
 - Preparation of public information/energy efficiency data; and
 - Technical assistance in the organization of weatherization site demonstrations at the local Sub-recipient level to illustrate program technology for policymakers and other partners.

It is anticipated that continued leveraging activities will enable the WV WAP to enhance and expand comprehensive low-income weatherization services and be viewed as a leader in energy conservation technology and a viable partner in conservation projects.

Listed below are the identified funding sources outside of DOE funding for the WV WAP at this time. However, it is a goal of the WV WAP to continue to pursue all funding possible to support and build upon the weatherization program in the state of West Virginia. This pursuit may include but not be limited to grants, foundation funds, and other non-federal partnerships.

Current non-DOE Funding Supporting WV WAP

Low-Income Home Energy Assistance Program (LIHEAP): The WV WAP will continue to utilize Low-Income Home Energy Assistance Program (LIHEAP) funds in the operation of the weatherization program. OEO has worked with the Department of Health and Human Resources (DHHR), the LIHEAP Grantee, to identify allowable measures and costs that could be supported by LIHEAP funding outside of DOE regulations and requirements. As per LIHEAP IM 1999-11, Weatherization Grantees "may use some, all or none of the statutory and regulatory provisions that apply to the Department of Energy's Low Income Weatherization Assistance Program when spending LIHEAP funds on weatherization activities, provided the grantee administers both programs." Therefore, OEO works with DHHR to construct the LIHEAP agreement to provide more flexibility within the program and the ability to address issues that may not be able to be addressed with DOE funding due to certain restrictions.

Currently, the most notable exceptions of LIHEAP funding are the three Supplemental Components: Electrical Upgrade, Weatherization Related Home Repair, and the Energy Crisis Intervention Program (ECIP) which historically have been approved measures of the Grant Agreement OEO has with DHHR. DHHR has also approved additional funds for Health and Safety measures through LIHEAP funding to keep the WV WAP Network in compliance with the 15% threshold for Health and Safety with DOE funds.

OEO also once again pursued and was granted an amount of LIHEAP funds for Healthy Homes/Weatherization Plus Health Pilot Projects. There are three projects currently being undertaken by WV WAP Sub-recipients differing in scope and objectives. Depending on the success and outcomes of these projects, OEO may continue to pursue additional LIHEAP funds for Healthy Homes/Weatherization Plus Health for future program years.

Utility Programs

Through participation of rate-case energy advocacy intervention activity at the Public Service Commission of West Virginia, the WVCAP continues to work and advocate for utility-weatherization leveraging partnership initiatives such as the following:

Dominion Hope Gas: In spring of 2009, WVCAP had intervened in a Dominion Hope Gas Company rate increase case in northern West Virginia. This case became complicated as the Company was also put up for sale in an acquisition case, in which negotiations became very complex. Although a new low-income weatherization program was agreed to in negotiations, the sale of the Company fell through and all proceedings were tabled. However, communication was reestablished with Dominion Hope and the Company provided \$300,000

for a low-income weatherization partnership for the Company's low-income rate payers. During 2014, provided and additional \$100,000 and will continue to provide \$100,000 per year until the Company's next rate case.

AEP dba Appalachian Power Company and Wheeling Power Company: In early 2009, WVCAP had intervened in an Appalachian Power Company/Wheeling Power Company filing at the Public Service Commission of West Virginia, in a rate increase request. Through various meetings and proceedings over a period of 18 months, in the fall of 2010 the PSC of WV ruled that the Companies would offer various Demand Side Management (DSM) programs for a two year period of time. A Low-Income Weatherization DSM Program was approved, for gross costs of \$367,050 in year one, and \$489,400 in year two. There were lengthy contract negotiations and development that occurred between AEP and OEO. A contract was finalized, implementing the DSM program in April of 2012. PY 2014 – 2015 was the third year of the contract. The contract and program scope have recently been revised for improvement. The contract and scope have been agreed upon by both OEO and AEP and the contract and program have now been extended through March 24, 2016. For calendar year 2015, AEP will provide \$500,000 for the program.

FirstEnergy Corporation dba Mon Power Company and Potomac Edison Company: As of February 25, 2011, Allegheny Energy and its subsidiaries, merged and became part of the FirstEnergy family of companies headquartered in Akron, Ohio. In West Virginia, FirstEnergy will continue to utilize Potomac Edison Company for the service area in the eastern panhandle, and the Mon Power Company in the north-central service area of the state. From this point forward, the former Allegheny Power programs will be FirstEnergy programs.

- <u>FirstEnergy EEP</u>: In a rate case settlement with Allegheny Energy in the summer of 2010, the Company agreed to continue funding an Electric Efficiency Partnership (EEP), with the same program design as the previous EEP, which ran from July 2007 thru June 2010, for \$250,000 per year. FirstEnergy has sustained this commitment after the merger with Allegheny Energy. For PY 2014 2015, FirstEnergy contributed \$350,000 and OEO anticipates a similar contribution for the continuation of an energy efficiency program in PY 2015-2016.
- TrailCo EEP+: As a result of a negotiated settlement in 2009 for a new 500 kV transmission line that would be run through part of West Virginia, OEO, in partnership with Allegheny Energy, agreed to a new "TrailCo" (Trans-Allegheny Interstate Line Company) Electric Efficiency Partnership 'Plus' program. The TrailCo EEP+ was designed to enhance the existing low-income Weatherization Assistance Program and what was known at the time as the Allegheny Energy EEP by expanding comprehensive energy efficiency services to low-income Allegheny Energy customers in the six county area that the TrailCo transmission corridor passes through; North Central West Virginia Community Action Association serves Monongalia, Preston, and Tucker counties and Eastern West Virginia Community Action Agency serves Grant, Hardy, and Hampshire counties. TrailCo EEP+ participation was restricted to those low-income customers who

qualified for DOE Weatherization and are customers of FirstEnergy in the six county high transmission line corridor. During PY 2015-2016 the WVWAP will continue to spend carry-over funds from previous years. \$500,000 would be available this year.

LICUAP: FirstEnergy Corporation has also developed and had approved a Low-Income Check-Up Audit Program (LICUAP) allowing the WV WAP Sub-recipients to perform "walk-thru" audits for low-income customers and address some basic baseload needs, as a complement to the WV WAP. This program was implemented in May 2012. This program will continue through PY 2014-2015. This program will differ than the others as the funds will not be administered by OEO; it is a contract between the utility company, its contracted entities, and the Sub-recipients. The program has been approved for five years, for a total of \$2,785,919. According to the Monongahela Power and The Potomac Edison Company Phase I Energy Efficiency and Conservation Plan the funding amount made available by FirstEnergy Corporation for year four of the program is \$632,685.

IV.5 Policy Advisory Council:

The Policy Advisory Council (PAC) historically meets at least once a year with periodic updates sent to members. The next meeting is tentatively planned for some time between April 15th and April 24th 2015, depending on what works for the members.

Policy Advisory Council Members:

NAME	ORGANIZATION	CONTACT INFORMATION	REPRESENTING
Steve	PRIDE Community	Steve@prideinlogan.com	WV WAP Network
Gilman	Services Inc.		
Ann	WV Statewide	ann.meadows@wvsilc.org	Disabled West
McDaniel	Independent Living		Virginians
	Council		
Gaylene	Senior State Director,	GMiller@aarp.org	Elderly
Miller	AARP		
Mary	Executive Director, WV	mchipps@suddenlinkmail.com	Community Action
Chipps	Community Action		Agencies
	Partnership		
Jacqueline	Public Service	jroberts@cad.state.wv.us	Consumers in
Roberts	Commission; Consumer		West Virginia
	Advocate Division		
Rachael	Dollar Energy - Utility	rcoffman@dollarenergy.org	Low-Income;
Coffman	Assistance Fund		Utility sector

The WV WAP PAC was reorganized in 2011 and has had recent adjustments in PY 2013 – 2014 and 2014 - 2015. OEO and the PAC are considering if the addition of a representative of children would be a beneficial addition to the PAC.

The PAC works to advise state weatherization staff on issues, challenges, and future direction of the program. The council is composed of members of associations and organizations serving the citizens of West Virginia. PAC members, by their leadership roles in the larger community, bring added value from an outside perspective to the program. The committee can also be an advocate for the general public about the Weatherization Assistance Program, low-income energy needs, and energy efficiency. The PAC will advise WAP staff on policy, based on their knowledge, perspective, and sensitivity to their particular constituency.

OEO anticipates increasing PAC meetings to a quarterly or biannual basis (or more as needed) to discuss pertinent issues and recommend broad policy implementation to insure an effective program.

During the next PAC meeting, members will have a chance to provide input for the PY2015 – 2016 State Plan. The minutes of the meeting will be made an attachment to this application.

IV.6 State Plan Hearings:

An announcement of the Public Hearing is planned to be posted for three (3) consecutive days, ten (10) days prior to the Public Hearing in eight (8) major newspapers throughout the state. We plan to announce the public hearing on April 10, 2015, and hold the Public Hearing on April 20th, 2015. The following newspapers will advertise the hearing:

- Bluefield Daily Telegraph
- Charleston Newspapers
- Dominion Post (Morgantown)
- Herald-Dispatch (Huntington)
- Parkersburg News
- Register-Herald (Beckley)
- The Journal (Martinsburg)
- Wheeling Newspaper, Inc.

The "Public Hearing Notice" that appeared in the newspapers will be included as an attachment and OEO will seek prior approval by OEO's DOE Projector Officer. OEO will also include evidence that each newspaper published the announcement as back-up documentation.

A court reporter will be retained to provide a transcript of the Public Hearing and OEO will provide the written script as an attachment.

IV.7 Miscellaneous:

"Recipient Business Officer"

Name: Julie Alston – OEO Director Email: Julie.A.Alston@wv.gov Phone: 304 – 558 – 8860 ext. 312

"Recipient Principal Investigator"

Name: Russell Tarry - Interim WAP Administrator

Email: Russell.W.Tarry@wv.gov Phone: 304 – 558 – 8860 ext. 233



West Virginia Weatherization Assistance Program

State of West Virginia
Office of Economic Opportunity

PART III - BUDGET
PY 2015 - 2016



U.S. Department of Energy BUDGET INFORMATION REMARKS

(Grant Number: EE0006192)

Remarks

OEO will be utilizing non-DOE resources to assist in the meeting of DOE WAP requirements. Primarily, these funds will be LIHEAP funds allocated to the WV WAP by the WV Department of Health and Human Resources. OEO has budgeted an even 50/50 split on the majority of expenses (unless otherwise noted in the specific Object Class Categories of the Budget Justification) between DOE WAP and LIHEAP funds. OEO will also utilize utility program administrative funds for the management of utility programs that run parallel to the DOE WAP.

Redistribution Provision: As necessary through the administration and management of this award, OEO may move funds between cost categories, functions, and activities to fully expend the monies during the budget period. All budget alterations or revisions will be in accordance with 2 CFR 200.308(e) and all other applicable federal rules and regulations. Parameters and criteria outlining situations in which a Sub-grantee would have an allocation reduced, receive an additional allocation, or need to move funds within their own budget are laid out in the DOE Sub-grantee Grant Agreements, following all applicable federal rules and regulations.

${\bf BUDGET\ INFORMATION\ -\ Non-Construction\ Programs}$

Program/Project Identification No. EE0006192		Program/Project Title Weatherization Assistance Program		
3. Name and Address West Virginia Office of Economic 700 Washington Street East Charleston, WV 25301		Opportunity	4. Program/Project Start Date	
			5. Completion Date	

		SECTIO	N A - BUDGET SU	MMARY		
Grant Program	Faland	Estimated Unob	oligated Funds	New or Revised Budget		
Function or Activity (a)	Federal Catalog No. (b)	Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. PY2015-16 DOE Annual Grant	81.042	\$ 0.00		\$ 2,668,468.00		\$ 2,668,468.00
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 2,668,468.00	\$ 0.00	\$ 2,668,468.00

	SEC	TION B - BUDGET	CATEGORIES		
6. Object Class Categories		Total			
	(1) GRANTEE ADMINISTR ATION	(2) SUBGRANTE E ADMINISTR	(3) GRANTEE T&TA	(4) PROGRAM OPERATION S	(5)
a. Personnel	\$ 73,990.00	\$ 0.00	\$ 179,379.00	\$ 0.00	\$ 255,512.00
b. Benefits	\$ 29,596.00	\$ 0.00	\$ 71,753.00	\$ 0.00	\$ 102,206.00
c. Travel	\$ 3,230.00	\$ 0.00	\$ 32,065.00	\$ 0.00	\$ 35,295.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 1,200.00	\$ 0.00	\$ 2,562.00	\$ 0.00	\$ 3,762.00
f. Contract	\$ 0.00	\$ 190,003.00	\$ 85,265.00	\$ 1,515,607.00	\$ 2,141,595.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other	\$ 25,407.00	\$ 0.00	\$ 104,691.00	\$ 0.00	\$ 130,098.00
i. Total Direct Charges	\$ 133,423.00	\$ 190,003.00	\$ 475,715.00	\$ 1,515,607.00	\$ 2,668,468.00
j. Indirect	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 133,423.00	\$ 190,003.00	\$ 475,715.00	\$ 1,515,607.00	\$ 2,668,468.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

Program/Project Identification No. EE0006192		Program/Project Title Weatherization Assistance Program	am
3. Name and Address	West Virginia Office of Economic Opportunity		4. Program/Project Start Date
700 Washington Street East Charleston, WV 25301			5. Completion Date

		SECTIO	N A - BUDGET SU	MMARY		
Grant Program		Estimated Unobligated Funds		New or Revised Budget		
Function or Activity (a)	Federal Catalog No. (b)	Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 2,668,468.00	\$ 0.00	\$ 2,668,468.00

	SEC	TION B - BUDGET	CATEGORIES				
6. Object Class Categories	Grant Program, Function or Activity						
	(1) HEALTH AND SAFETY	(2) LIABILITY INSURANCE	(3) FINANCIAL AUDITS	(4) LEVERAGIN G	(5)		
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 2,143.00	\$ 255,512.00		
b. Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 857.00	\$ 102,206.00		
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 35,295.00		
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00		
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 3,762.00		
f. Contract	\$ 227,339.00	\$ 82,253.00	\$ 41,128.00	\$ 0.00	\$ 2,141,595.00		
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00		
h. Other	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 130,098.00		
i. Total Direct Charges	\$ 227,339.00	\$ 82,253.00	\$ 41,128.00	\$ 3,000.00	\$ 2,668,468.00		
j. Indirect	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00		
k. Totals	\$ 227,339.00	\$ 82,253.00	\$ 41,128.00	\$ 3,000.00	\$ 2,668,468.00		
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00		

U.S. DEPARTMENT OF ENERGY



BUDGET JUSTIFICATION FOR FORMULA GRANTS

Applicant: West Virginia Office of Economic Opportunity

Award number: EE0006192

Budget period: -

 PERSONNEL - Prime Applicant only (all other participant costs are listed in 6 below and form SF-242A, Section B. Line 6.f. Contracts and Sub-Grants).

Positions to be supported under the proposed award and brief description of the duties of professionals:

Position Description of Duties of Professionals		
OEO Accountant	Payment and tracking of agency funding request and other bills	
OEO Accounting Tech	Support for accounting staff	
OEO Administrative Secretary	General secretarial duties for agency/management	
OEO Chief Financial Officer	Oversee fiscal operations at OEO	
OEO Deputy Director - VACANT	Assist in management of OEO 75% of \$55,656 due to current vacancy	
OEO Director	Direct and manage Office of Economic Opportunity	
Program Development Manager/Interim WX Manager	Work with Utility Compaines to leverage funds for WAP; Manager WX Program until hire of permanent manager \$21,009 TTA \$2,143 Leveraging	
Program Specialist	Monitoring and T&TA	
Program Specialist/Monitoring	Monitoring and T&TA	
Program Specialist/Training	Monitoring and T&TA	
WAP Systems Specialist	Develop and maintain data management system, train CAA staff	
Weatherization Administrator - VACANT	Administer, manage, and coordinate WV Weatherization Assistance Program	
Weatherization Assistant Adminstrator	Assist in management and administration of WAP, includes some monitoring	
Weatherization Secretary	General secretarial duties	
Monitoring Coordinator	Manage/oversee Monitoring efforts	
Training Coordinator	Manage/oversee training and technical assistance activities	
Fiscal Monitor	Perform fiscal monitorings	

Direct Personnel Compensation:

Position	Salary/Rate	Time	Direct Pay	
OEO Accountant	\$40,512.00	19.9990 % FT	\$8,101.99	
OEO Accounting Tech	\$34,332.00	19.9988 % FT	\$6,865.99	
OEO Administrative Secretary	\$30,456.00	14.9986 % FT	\$4,567.97	
OEO Chief Financial Officer	\$54,504.00	13.0000 % FT	\$7,085.52	
OEO Deputy Director - VACANT	\$41,742.00	17.0000 % FT	\$7,096.14	
OEO Director	\$68,064.00	25.0000 % FT	\$17,016.00	
Program Development Manager/Interim WX Manager	\$47,748.00	48.4879 % FT	\$23,152.00	
Program Specialist	\$40,512.00	50.0000 % FT	\$20,256.00	
Program Specialist/Monitoring	\$44,508.00	50.0000 % FT	\$22,254.00	
Program Specialist/Training	\$50,916.00	50.0000 % FT	\$25,458.00	
WAP Systems Specialist	\$41,736.00	40.0000 % FT	\$16,694.40	
Weatherization Administrator - VACANT	\$50,000.00	50.0000 % FT	\$25,000.00	
Weatherization Assistant Adminstrator	\$45,696.00	50.0000 % FT	\$22,848.00	
Weatherization Secretary	\$31,344.00	15.0000 % FT	\$4,701.60	
Monitoring Coordinator	\$43,344.00	30.0000 % FT	\$13,003.20	

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Budget Justification EE0006192

		Direct Pay Total	\$255,512.01
Fiscal Monitor	\$37,008.00	15.0000 % FT	\$5,551.20
Training Coordinator	\$51,720.00	50.0000 % FT	\$25,860.00

2. FRINGE BENEFITS

- a. Are the fringe cost rates approved by a Federal Agency? If so, identify the agency and date of latest rate agreement or audit below, and attach a copy of the rate agreement to the application.
- b. If a. above does not apply, please use this box (or an attachment) to further explain how your total fringe benefits costs were calculated. Your calculations should identify all rates used, along with the base they were applied to (and how the base was derived), and a total for each (along with grand total). If there is an established computation methodology approved for state-wide use, please provide a copy. Also, please fill out the table below with the Fringe Benefits Calculations.

The basis for computation of rates for fringe benefits of State employees includes federal and state regulations, personnel policies, and past experience. Fringe benefits to be paid from this grant include: Social Security match - FICA @ 7.65% of the gross salary as per federal regulation

Workers compensation - calculated at .64% of gross salaryUnemployment compensation - paid on reimbursement basisHealth insurance - depends on salary, type of coverage (single or family), optional life, and choice of plan, as per personnel policies and state optionsState Retirement fund - calculated at 14.5% of gross salaryWe are using 40% for budgeting purposes in this grant year, based on average fringe benefit costs from the previous grant year.

Fringe Benefits Calculations

Position	Direct Pay	Rate	Benefits
OEO Accountant	\$8,101.99	40.0150 %	\$3,242.01
OEO Accounting Tech	\$6,865.99	40.0000 %	\$2,746.40
OEO Administrative Secretary	\$4,567.97	40.0000 %	\$1,827.19
OEO Chief Financial Officer	\$7,085.52	40.0000 %	\$2,834.21
OEO Deputy Director - VACANT	\$7,096.14	40.0000 %	\$2,838.46
OEO Director	\$17,016.00	40.0000 %	\$6,806.40
Program Development Manager/Interim WX Manager	\$23,152.00	40.0000 %	\$9,260.80
Program Specialist	\$20,256.00	40.0000 %	\$8,102.40
Program Specialist/Monitoring	\$22,254.00	40.0000 %	\$8,901.60
Program Specialist/Training	\$25,458.00	40.0000 %	\$10,183.20
WAP Systems Specialist	\$16,694.40	40.0000 %	\$6,677.76
Weatherization Administrator - VACANT	\$25,000.00	40.0000 %	\$10,000.00
Weatherization Assistant Adminstrator	\$22,848.00	40.0000 %	\$9,139.20
Weatherization Secretary	\$4,701.60	40.0000 %	\$1,880.64
Monitoring Coordinator	\$13,003.20	40.0000 %	\$5,201.28
Training Coordinator	\$25,860.00	40.0000 %	\$10,344.00
Fiscal Monitor	\$5,551.20	40.0000 %	\$2,220.48
		Fringe Benefits Total	\$102,206.03

3. TRAVEL

 Please provide the purpose of travel, such as professional conference(s), DOE sponsored meeting(s), project management meeting, etc. If there is any foreign travel, please identify.

Purpose of Trip	Number of Trips	Cost Per Trip	Total
National DOE Conference Total cost for 10ppl @ 2000 = 20000 DOE cost 10000 admin 2000 tta 8000	10	\$1,000.00	\$10,000.00
NASCSP Webinars 6 X \$60=\$360 X 50%=180	6	\$30.00	\$180.00

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Budget Justification	EE0006192

WAP Program Monitoring Total Cost 3720 DOE 50% = 1860	12	\$155.00	\$1,860.00
Return Field Monitoring Trips for Follow Up compliance Total Cost: 3100 DOE Cost 50% = 1550	10	\$155.00	\$1,550.00
National Healthy Homes Conference 3 X \$1,700=\$5,100 X 50%=\$2,550	3	\$850.00	\$2,550.00
WAP Field Monitoring Total Cost: \$13050 (450 per trip) DOE cost 50% = 6525	29	\$225.00	\$6,525.00
Fall & Mid-Winter NASCSP Conference Total Cost \$14000 DOE Total Cost: 7000	7	\$1,000.00	\$7,000.00
CAPLAW Conference 4 x \$2,200= \$8,800x 50% = \$4,400	4	\$1,100.00	\$4,400.00
WAP Fiscal Monitoring Total Cost: 2460 All admin DOE cost 50% = 1230	12	\$102.50	\$1,230.00
		Travel Total	\$35,295.00

Please provide the basis for estimating the costs, such as past trips, current quotations, Federal Travel Regulations,
 etc. All listed travel must be necessary for the performance of the award objectives.

Most travel estimates are based on State Travel Policy and past trips of a similar nature.

- 4. <u>EQUIPMENT</u> Equipment is generally defined as an item with an acquisition cost greater than \$5,000 and a useful life expectancy of more than one year. Further definitions can be found in 10 CFR 600.
 - a. List all proposed equipment below and briefly justify its need as it applies to the objectives of the award.

Equipment	Unit Cost	Number	Total Cost	Justification of Need
		One of the latest terms to the latest terms term terms to the latest terms terms to the latest terms term terms to the latest terms to the latest terms to the latest	The second secon	

- b. Please provide a basis of cost such as vendor quotes, catalog prices, prior invoices, etc. and justify need. If the Equipment is being proposed as Cost Share and was previously acquired, please provide the source and value of its contribution to the project and logical support for the estimated value shown. If it is new equipment which will retain a useful life upon completion of the project, provide logical support for the estimated value shown. Also, please indicate whether the Equipment is being used for other projects or is 100% dedicated to the DOE project.
- 5. <u>SUPPLIES</u> Supplies are generally defined as an item with an acquisition cost of \$5,000 or less and a useful life expectancy of less than one year. Supplies are generally consumed during the project performance. Further definitions can be found in 10 CFR 600.
 - a. List all proposed supplies below, the estimated cost, and briefly justify the need for the supplies as they apply to the objectives of the award. Note that all direct costs, including Supply items, may not be duplicative of supply costs included in the indirect pool that is the basis of the indirect rate applied for this project.

General Category	Cost	Justification of Need
General Office Supplies, DOE Share	\$2,400.00	Office supplies for daily use in operating program-paper, ink, pens, clips, binders, tape, etc. Total 12 month cost: 4800 (DOE 50%) admin 1200 tta 1200
computer purchase/upgrade	\$1,362.00	Total Cost: 2724 (50% DOE)
Materials and Supplies Total	\$3,762.00	

b. Please provide a basis of cost for each item listed above and justify need. Examples include vendor quotes, prior purchases of similar or like items, published price list, etc.

Costs are based on previous year's costs.

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Budget Justification EE0006192

6. <u>CONTRACTS AND SUBGRANTS</u> - Provide the following information for New proposed subrecipients and subcontractors. For ongoing subcontractors and subrecipients, this information does not have to be restated here, if it is provided elsewhere in the application; under Name of Proposed Sub, indicate purpose of work and where additional information can be found (i.e weatherization subgrants, Annual File section II.3).

Name of Proposed Sub	Total Cost	Basis of Cost*
CHANGE, Inc.	\$118,445.00	Operate local WAP
Council of the Southern Mountains	\$42,566.00	Operate local WAP
DBA FACSPro	\$25,000.00	WAP database management sys. Total WAP cost: \$50000 DOE upgrade cost: 5000 TTA DOE System Maintenance Fee: 20,000 TTA
Southwestern CAC	\$264,855.00	Operate local WAP
Training Centers/Trainers Costs for Subgrantees - All TBD	\$60,265.00	All costs are estimates - All trainings will go through bidding process Total WAP cost: \$215,231; DOE paying 28% DOE Costs - ALL TTA: HVAC Certification (4 Separate Courses): \$26,064 BPI QCI: \$11,270 BPI EA: \$21,804 Energy Edu: \$392 Continued SWS Training: \$595
PRIDE Community Services	\$48,529.00	Operate local WAP
MountainHeart Community Services	\$89,245.00	Operate local WAP
Community Action of South Eastern WV	\$200,698.00	Operate local WAP
Mountain CAP of WV, a CDC	\$99,526.00	Operate local WAP
Eastern WV CAA, Inc.	\$212,625.00	Operate local WAP
North Central WV CAA, Inc.	\$445,194.00	Operate local WAP
Community Resources, Inc.	\$257,657.00	Operate local WAP
Coalfield CAP	\$242,030.00	Operate local WAP
Nicholas CAP	\$34,960.00	Operate local WAP
Contracts and Subgrants Total	\$2,141,595.00	

^{*}For example, Competitive, Historical, Quote, Catalog

a. Please provide a General Description, Cost and Justification of Need.

General Description	Cost	Justification of Need
Computer Networking	\$16,353.00	Computer Networking cost, IT costs, Website costs Costs based on actual expenses Total WX cost: 32705 Doe 50%: 16353 Admin: 7,359 TTA: 8,994
Associations and Professional Memberships	\$3,150.00	Total cost \$6300 DOE 50% = 3150 All TTA Total WAP costs: Contractor License: 1000 HVAC Contractor License: 1100 HVAC Electrical License: 1050 Single Family Electrical: 850 EPA Section 608: 1400 Lead Firm Certificate: 900
Vehicle Maintenance/Repairs	\$1,750.00	WX share: 3500 DOE 50%: 1750 All TTA
NASCSP Yearly Membership Fees	\$1,650.00	Association Dues Total Cost: 3300 DOE Cost: 1650 All admin
Parking	\$2,490.00	WX Share: \$4980 4980 x 50% = 2490 All TTA
Oasis Fees	\$750.00	WV State financial system fees WX Cost: 1500 DOE: 50%. \$750 All Admin
OEO Insurance	\$4,655.00	WX Share = 9310 DOE 50% Admin 2190 TTA 2465
Telecommunications	\$3,700.00	Desk phones, cell phones, and conference calls WX share: 7400 DOE 50% = 3700 Admin: 740 TTA: 2960

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^{7.} OTHER DIRECT COSTS - Other direct costs are direct cost items required for the project which do not fit clearly into other categories. These direct costs may not be duplicative of costs included in the indirect pool that is the basis of the indirect rate applied for this project. Examples are: conference fees, subscription costs, printing costs, etc.

T&TA Support for Sub-grantee Travel Certifications	for Trainings &	\$55,258.00	Total WAP Cost: 110515 DOE 50%: 55,258 TOTAL WAP Cost: HVAC Certification (4 classes): 72,540 BPI QCI: 17,825 BPI EA: 20,150
Office Space		\$33,942.00	WX: \$67,884 (OEO main office and Ghent Training Center Office) DOE cost 67,884x 50% = \$33,942 Admin: 11,826 TTA: 22,116
Postage		\$192.00	Total WX cost: 384 DOE 50%: 192 All admin
Vehicle Fuel		\$3,600.00	WX Cost: 7200 DOE 50%: 3600 All TTA
Field Equipment Maintenance and Rep	air	\$500.00	Total WX cost: 1000 DOE 50%: 500 All TTA
Advertising and Transcript for Public F	Hearing	\$700.00	total cost: \$1400 50% = \$700 all admin
Office Equipment Rental, Maintenance	, and Repair	\$1,408.00	Training Center Office Equip 2816 X 50% = \$1408 All TTA
Ot	her Direct Costs Total	\$130,098.00	

 Please provide a basis of cost for each item listed above. Examples include vendor quotes, prior purchases of similar or like items, published price list, etc.

Rental and dues costs are based on agreements. Other costs are estimates based on prior similar expenditures or recent estimates

All costs included in Other Direct Costs are properly segregated from indirect costs to ensure there are not duplicate charges.

0

All costs proposed are only being used in support of the WAP program.

8. INDIRECT COSTS

- a. Are the indirect cost rates approved by a Federal agency? If so, identify the agency and date of latest rate agreement or audit and provide a copy of the rate agreement.
- b. If the above does not apply, indicate the basis for computation of rates, including the types of benefits to be provided, the rate(s) used, and the cost base for each rate. You may provide the information below or provide the calculations separately.

The name and pho-	ne number of th	e individual	reennneihle f	for penotiating	the State's	indirect co	et ratoe

Name:

Phone Number:

WEST VIRGINIA WEATHERIZATION ASSISTANCE PROGRAM

2015 – 2016 STATE PLAN

ATTACHMENTS



The Culture Center 1900 Kanawha Blvd., E. Charleston, WV 25305-0300

Randall Reid-Smith, Commissioner

Phone 304.558.0220 • www.wvculture.org Fax 304.558.2779 • TDD 304.558.3562

December 5, 2014

Ms. Lyn M. Bartges Weatherization Administrator WV Office of Economic Opportunity 700 Washington Street East 4th Floor Charleston, WV 25301

RE: Three Year Agreement - Excluded Activities FR# 15-89-MULTI

Dear Ms. Bartges,

We have received your letter which outlines the specific roles and responsibilities of the WV Office of Economic Opportunity and the State Historic Preservation Office for a period of three years from December 1, 2014 to November 30, 2017. Attached is a list of exempted activities from individual review. These activities relate to the U.S. Department of Energy Grantees of the Weatherization Assistance Program for Low Income Persons (WAP) in the State of West Virginia. We concur with the contents of your letter and the list. Fulfillment of the agreed procedures and adherence to the list fulfills the obligations of our agencies according to Section 106 of the National Historic Preservation Act of 1966.

Thank you for your cooperation. Please contact our office should there be any programmatic or staff changes, as well as questions or concerns.

Susan M. Pierce

Sincerely.

Deputy State Historic Preservation Officer



West Virginia Office of Economic Opportunity

700 Washington Street, E., 4th Floor, Charleston, WV 25301 Phone: 304-558-8860 | Fax: 304-558-4210 www.oeo.wv.gov

October 22, 2014

Susan M. Pierce Deputy State Historic Preservation Officer West Virginia Division of Culture and History 1900 Kanawha Boulevard East Charleston, WV 25305

Dear Ms. Pierce.

I would like to request a renewal of the agreement between the Office of Economic Opportunity and the WV State Historic Preservation Office for a period of three (3) years, from December 1, 2014 to November 30, 2017. The Office of Economic Opportunity (OEO) is the administering agency of DOE funds for WAP in the State of West Virginia. This correspondence is to ensure compliance with the National Historic Preservation Act (NHPA or "the Act"), 16 U.S.C 470 et seq., as it relates to Department of Energy (DOE) Grantees of the Weatherization Assistance Program for Low-Income Persons (WAP), specifically in the State of West Virginia. It is our opinion that our program will result in numerous projects that do not have the potential to impact historic resources. We request your concurrence with this determination and have attached to this letter a list of the undertakings that we would request to be exempt from Section 106 review by your office. In anticipation of your agreement with these findings, we have taken the liberty to outline what our organization believes to be the roles and responsibilities of the State Historic Preservation Office and the Office of Economic Opportunity.

Specific roles and responsibilities of both parties are as follows:

- OEO shall be responsible for conducting Section 106 reviews in a timely manner, preparing documentation, and maintaining records on undertakings. Undertakings that involve properties greater than forty five (45) years old and are not listed on Appendix A (attached) shall be submitted to the SHPO for review.
- 2. OEO shall ensure that the provisions of this agreement apply to its sub-grantees and to their sub-recipients.
- OEO shall not submit to the SHPO undertakings outlined on the attached list as they
 do not have the potential to cause effects on historic properties even when historic
 properties may be present.
- 4. As allowed under Section 106 of the NHPA, the SHPO shall provide comments to OEO within thirty (30) days for reviews. In the event that the SHPO fails to comment within the thirty (30) day period, OEO can assume the SHPO has concurred, and proceed.

- 5. OEO will advise sub-grantee agencies of the provisions in Section 110 (k) of the Act and will advise the sub-grantees that Section 106 reviews may be compromised when project undertakings are initiated prematurely.
- 6. Both parties shall make every effort to expedite Section 106 reviews for a period of less than the 30-day review when consistent with the terms of the DOE grant agreements. OEO has identified two (2) qualified staff members to review these projects. These qualified persons have attended training regarding the National Register of Historic Places and will be applying the criteria of the National Register. Their certificates are attached. When an emergency, as defined by OEO, has the potential to impact a building 45 years or older and necessitates a quicker review by the SHPO, the SHPO will make every reasonable effort to expedite the review. As defined by the OEO, emergencies exist where there is a need to eliminate an imminent threat to health and safety of residents. It is the OEO's responsibility to communicate to the SHPO the need for an expedited review.
 - a. OEO shall forward documentation to the SHPO for review immediately upon notification that an emergency exists. Documentation should include a) nature of the emergency; b) the address of the historic property involved; c) photographs showing the current condition of the building; and d) the time frame allowed by local or county officials to respond to, or correct, the emergency situation.
 - b. If an emergency undertaking will result in an adverse effect to a historic resource, the OEO will work with the SHPO to avoid, minimize or mitigate the adverse effect.
- 7. OEO shall maintain a list of undertakings and shall make the documentation available to the public.

We request that the attached list be exempted from individual review for a period of three (3) years, from December 1, 2014 until November 30, 2017. OEO and its sub-recipients will maintain appropriate documentation of its funded activities should the SHPO wish to review the ongoing application of these exemptions. Please provide your comments and concurrence with this proposed list of exemptions.

Sincerely,

Lyn M. Bartges

Weatherization Administrator

Jyn III Bartyen

WAP UNDERTAKINGS EXEMPT FROM SECTION 106 REVIEW

All undertakings will be done in accordance with applicable local building codes or the International Building Code, where applicable. In accordance with 36 CFR 800.3(a)(1), the following undertakings have been determined to have no potential to cause effects on historic properties:

A. Exterior Work

- 1) Air sealing of the building shell, including caulking, weather-stripping, and other air infiltration control measures on windows and doors, and installing thresholds in a manner that does not harm or obscure historic windows or trim.
- 2) Thermal insulation, such as non-toxic fiberglass and foil wrapped, in walls, floors, ceilings, attics, and foundations in a manner that does not harm or damage historic fabric.
- 3) Blown in wall insulation where no holes are drilled through exterior siding, or where holes have no permanent visible alteration to the structure
- 4) Removable film on windows (if the film is transparent), solar screens, or window louvers, in a manner that does not harm or obscure historic windows or trim.
- 5) Reflective roof coating in a manner that replicates the historic materials and form, or with materials that restore the original feature based on historic evidence, and in a manner that does not alter the roofline, or where not on a primary roof elevation or visible from the public right-of-way.
- 6) Repair of minor roof and wall leaks prior to insulating attics or walls, provided repairs replicates existing surface composite

B. Interior Work

Special Note: Undertakings to interior spaces where the work will not be visible from the public right of way; no structural alterations are made; no demolition of walls, ceilings or floors occurs; no drop ceilings are added; or no walls are leveled with furring or moved, should be automatically excluded from **SHPO** review. This work includes:

1. Energy efficiency work within the building shell:

- a. Thermal insulation in walls, floors, ceilings, attics, crawl spaces, ducts and foundations
- b. Blown in wall insulation where no decorative plaster is damaged.
- c. Plumbing work, including installation of water heaters
- d. Electrical work, including improving lamp efficiency
- e. Sealing air leaks using weather stripping, door sweeps, and caulk and sealing major air leaks associated with bypasses, ducts, air conditioning units, etc.
- f. Repair or replace water heaters
- g. Adding adjustable speed drives such as fans on air handling units, cooling tower fans, and pumps
- h. Install insulation on water heater tanks and water heating pipes

i. Install solar water heating systems, provided the structure is not visible from the

public right of way

j. Install waste heat recovery devices, including desuperheater water heaters, condensing heat exchangers, heat pump and water heating heat recovery systems, and other energy recovery equipment

k. Repair or replace electric motors and motor controls like variable speed drives l. Incorporate other lighting technologies such as dimmable ballasts, day lighting

controls, and occupant controlled dimming

2. Work on heating and cooling systems:

- a. Clean, tune, repair or replace heating systems, including furnaces, oilers, heat pumps, vented space heaters, and wood stoves
- b. Clean, tune repair or replace cooling systems, including central air conditioners, window air conditioners, heat pumps, and evaporative coolers
- c. Install insulation on ducts and heating pipes
- d. Conduct other efficiency improvements on heating and cooling systems, including replacing standing pilot lights with electronic ignition devices and installing vent dampers
- e. Modify duct and pipe systems so heating and cooling systems operate efficiently and effectively, including adding return ducts, replace diffusers and registers, replace air filters, install thermostatic radiator controls on steam and hot water heating systems
- f. Install programmable thermostats, outdoor reset controls, UL listed energy management systems or building automation systems and other HVAC control systems

3. Energy efficiency work affecting the electric base load of the property:

- a. Convert incandescent lighting to fluorescent
- b. Add reflectors, LED exist signs, efficient HID fixtures, and occupancy (motion) sensors
- c. Replace refrigerators and other appliances

4. Health and safety measures:

- a. Installing fire, smoke or carbon dioxide detectors / alarms
- b. Repair or replace vent systems on fossil-fuel-fired heating systems and water heaters to ensure that combustion gasses draft safely to outside
- c. Install mechanical ventilation, in a manner not visible from the public right of way, to ensure adequate indoor air quality if house is air-sealed to building tightness limit

Advisory Council on Historic Preservation

The Se entials

17, 2011, %

Janny J. Weely

uly completed the course

Reid Nelson Director, Office of Federal Agency Programs

Advisory Council on Historic Preservation

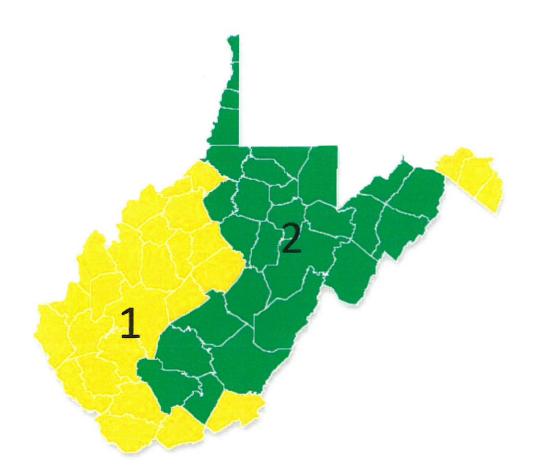
The Section 106 Essentials

April 17-18, 2012, Atlanta, GA

This will verify that

Teresa Longfellow

has successfully completed the course



U.S. DEPARTMENT OF ENERGY WEATHERIZATION ASSISTANCE PROGRAM QUALITY CONTROL INSPECTION FORM

Agency: Job	#:
Inspection Date:	
Client Name: Ov	wner Renter
City/Street:	Pre-1978 Home: Yes No
Housing Type: Single Family Mobile Home M	fulti-family Shelter
FILE REVIEW	YES NO N/A Notes:
 Eligibility Determination present? Energy Audit Recommended Measures Report Total Job Cost: 	
DOE/DHHR Investment: \$ Utility Total Job Investment: \$ 4. Utility Partnership Documentation 5. Weatherization Assistant Work Order 6. Energy Audit Data Collection Form 7. Lead Safe Weatherization Documentation 8. Mold/Moisture Form Documentation 9. Energy Education Documentation 10. Hold Harmless Form Documentation 11. State Historic Preservation Documentation 12. Client Education Documentation 13. Refrigerator Inspection & Replacement Form 14. Pre & Post Combustion Safety Tests/Tapes 15. Pre & Post Blower Door Results (@CFM 50)	Investment: \$
Pre #: Post (verified) #: 17. Customer Satisfaction Form Signed/Dated 18. ASHRAE 62.2 2013 Vent. Documentation 19. CAZ Worst Case Dep. Documentation 20. Manual J Documentation 21. Solid Fuel Appliance Condition Report 22. WX Tag Documentation 23. Photo Documentation 24. FACS Pro records complete 25. FACS Pro Attachments are complete 26. Other (Describe):	

٠.	N-SITE WORK ASSESSMENT	YES	NO	N/A	
1. 2. 3. 4. 5. 6. 7. 8. 9.	Air Conditioning Replacement Heating System Tune-Up Air Conditioning Tune-Up Distribution System Modifications Duct Sealing Set-Back Thermostat Filter Installed and one left with client Measures(s) were Properly Justified				Comments – HVAC
11	Ventilation Requirements Verified and Comply with ASHRAE 62.2 2013CAZ Testing Verified, Documentation is CompletWork Meets WV WAP Installation Standards	□ e□ □			
AT 1. 2. 3. 4. 5. 6. 7. 8. 9.	Attic Insulation Installed: Good Coverage R-value Insulation Certificate Completed & Posted Heat Source/ Vent Damming Junction Box Markers Present Attic Access Insulated and Secured Attic Air Sealing was Performed Measure(s) were Properly Justified Work Meets WV WAP Installation Standards				Comments – Attic Work
	DEWALLS & KNEEWALLS Walls Insulated by WAP Plugs, Patching, & Painting appropriate Measure(s) was Properly Justified Work Meets WV WAP Installation Standards				Comments - Sidewalls
SU 1. 2. 3. 4. 5.	BSPACE Bandboard Insulation added by WAP Floor Insulation added by WAP Basement Wall Insulation added by WAP Vapor Barrier added; Coverage & Secure Measure(s) were Properly Justified Work Meets WV WAP Installation Standards				
W1 1. 2. 3. 4. 5. 6.	Number of Windows Replaced: Number of Storm Windows Installed: Number of Doors Replaced: Door Weatherstripping/Thresholds/Sweeps Pre/Post Photo Documentation Completed Measure(s) were Properly Justified Work Meets WV WAP Installation Standards				Comments – Windows/Doors

OTHER MEASURES 1. Water Heater Replacement 2. Water Heater Treatment (Tank Wrap) 3. Pipe Insulation 4. Low Flow Showerheads 5. Lighting - CFLs Installed 6. Refrigerator Replacement	YES	NO	N/A	Comments – Other Measures
INCIDENTAL REPAIR MEASURES (IRM's) 1. All IRM's are justified in the client file with an explanation for their need and specific energy conservation measure (ECM) or group of ECM's. YES \[\Boxedom{NO \Boxedom{N/A \Boxedom{N}}} \] N/A \[\Boxedom{N/A \Boxedom{N}}				
2. All IRM's are within the \$500.00 limit and are justified with an SIR of 1 or greater. YES \square NO \square N/A \square				
Does this unit need additional attention from the agency?				
1100001				

All corrections must be completed and signed off by the crew leader. When corrections are completed the QCI must sign off affirming that required deficiencies were addressed to WV WAP standards. If job was inspected and all corrections were made on the final day of job, crew leader (CL) and QCI must sign Work Order to verify completion. Final day inspections must reflect corrections cited by Quality Control Inspector. Report must be included in client **Corrections** CL QCI Crew Leader Name (Print): | Signature: _______Date: / / QCI Signature: ______Date: / /___ QA Assessor Name (Print): Signature: ______ Date:___/___/__ WX tag has been correctly initialed, dated and posted in the correct locations. ☐ I hereby confirm that this job is considered complete, that all measures have been properly justified and can be reported as a completion.

Last Revised 4/8/2015 3:34 PM

REQUIRED CORRECTIVE ACTION(s)

V.7 Health And Safety

Introduction

The primary goal for the WV WAP is to implement cost-effective weatherization procedures to conserve energy and to assess and correct related health and safety hazards for the well-being of clients, their dwellings, and weatherization personnel.

With more advanced diagnostics and installation techniques utilized in the WV WAP, it is increasingly necessary to take steps to ensure that program measures do not cause or exacerbate health and safety problems for workers or clients.

Each home weatherized must be individually assessed to determine the existence of potential hazards to weatherization personnel or clients. When conditions within the home are such that the health and safety of the client, crew, or subcontractor will be jeopardized prior to providing assistance, weatherization must not proceed until such problems are remedied. In some cases, mitigation of problems may be beyond the scope of the weatherization program. In these instances, the client must be notified in writing and referred to alternative resources for resolution of the problem.

In those instances where the existing conditions are perceived to pose a threat to the crew or contractor's health and safety, the WV WAP allows for deferral of weatherization work until the identified condition is made acceptable. The WV WAP Deferral Policy is described in *Section V.1.2 Approach to Determining Building Eligibility*.

Budgeting

The WV WAP will budget Health and Safety in a separate category and thereby exclude such costs from the average unit cost calculations. This separate category will also allow these costs to be isolated from energy efficiency costs in program evaluation.

Incidental Repairs

Incidental Repairs means those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, minor roof repair, framing or repairing windows and doors which could not otherwise be caulked or weatherstripped, and providing protective materials, such as paint, used to seal materials installed under this program. Incidental repairs must be justified in the client file with an explanation for their need and relationship to a specific energy conservation measure (ECM) or group of ECMs. The WV WAP has developed a spreadsheet identifying allowable measures to be installed under health and safety and allowable measures to be installed as incidental repairs.

Health and Safety Expenditure Limits

For the 2015 – 2016 Program Year, West Virginia would request to utilize up to **15%** of our 2015 Program Operation funds for Health and Safety Expenditures. WV WAP will use its data management system to implement a limit on Health and Safety costs charged to DOE on a per job basis. Any health and safety costs over 15% will be charged to LIHEAP funding, as approved from the WV Department of Health and Human Resources (DHHR), the LIHEAP Pass-through entity.

Health and Safety costs are recorded in the data management system and tracked separately at the Sub-recipient level for accounting purposes, as well as in the Weatherization Assistant auditing software and reported as a separate line item on the WV WAP "Monthly Progress Report." A list of materials that are allowable charges to Health and Safety has been developed and distributed. (See *Health and Safety Plan IRM-H&S Materials Chart Attachment*) Sub-recipients cannot add additional materials to this list. In this way, OEO can monitor the Health and Safety cost on each job. The Health and Safety costs reported on the WV WAP "Monthly Progress Report" are reviewed monthly and OEO works with the Sub-recipient to bring them into compliance. OEO also tracks the Health and Safety costs in the statistical analysis tool and other various spreadsheets as discussed in *Section V.6 Weatherization Analysis of Effectiveness*.

OEO has worked with the utility companies and scopes of work have been adjusted so that the WV WAP can use certain utility funding to cover particular Health and Safety costs (specified in the Scopes of Work/Program Designs of the utility program), to lessen the burden on the DOE funds. At this time, not all utility partnerships allow for Health and Safety costs in their programs, but OEO will continue to pursue this option in the future.

Healthy Homes/Weatherization Plus Health

During PY 2014 – 2015, OEO pursued and was granted an amount of LIHEAP funds for Healthy Homes/Weatherization Plus Health Pilot Projects. These projects were to help West Virginia's most vulnerable families and make their homes energy efficient, safe, and healthy. The WV WAP projects offer a more comprehensive, holistic approach coupled with Weatherization to help combat disease and injury in the home linking substandard housing and poor health. This funding and the associated projects allow the participating WV WAP Sub-recipients to address issues that are outside of the scope of the typical parameters of the DOE Health and Safety funding capabilities. Based on the success and outcomes of these projects, OEO has chosen to pursue additional LIHEAP funds for Healthy Homes/Weatherization Plus Health for PY 2015 – 2016. There are three projects currently being undertaken by WV WAP Sub-recipients differing in scope and objectives.

Potential Hazard Considerations

1. Biological and Unsanitary Conditions

The detection and remediation of mold, odors, viruses, bacteria, unsanitary conditions, and rotting wood is often beyond the scope of the Weatherization Assistance Program, and may be a reason for deferral. Since workers often encounter these conditions, they try to remedy the situation if possible and take precaution to not exacerbate any potential problem. Factors such as cleaning agents, paints and turpentine, gasoline, sewage, animal waste, and excessive dust can sometimes be addressed to allow weatherization work to occur. Auditors will inform the client of observed conditions.

 Mold and Moisture - The Weatherization Assistance Program is not a mold remediation program. The use of DOE funds for the removal of mold and other related biological substances is not an allowable weatherization expense. Mold testing is not an allowable cost. If necessary, Weatherization Assistance Program services may need to be deferred until the existing mold problem can be corrected or referred to another program for funding of remedial action.

All homes will be inspected for previous and existing moisture problems using the WV WAP "Mold Procedure/Checklist Form" to document existing mold and moisture related problems in homes.

Moisture, mold, and mildew can seriously affect the health and safety of the client and crew. Steps must be taken to alleviate moisture problems. The WV WAP will ensure that regular weatherization work is performed in a manner that doesn't contribute to the increase of any mold problems, and when the work is performed properly, can alleviate many mold conditions.

- Drainage Auditors will conduct a visual inspection. Major drainage issues are beyond the scope of the Weatherization Assistance Program. Homes with conditions that may create a serious health concern that require more than incidental repair should be deferred.
- Combustion Appliances and Combustion Gases Proper venting to the outside for combustion appliances, including gas dryers is required. Correction of venting is allowed when testing indicates a problem.

Sub-recipients will be required to conduct combustion safety testing when combustion appliances are present

Sub-recipients will conduct inspection and testing of combustion appliances zones (CAZ) and confirm adequate clearances and test naturally drafting appliances for draft and

spillage under worst case conditions before and after air tightening and inspect gas cooking appliances for safe operability.

Sub-recipients will provide the client with combustion safety and hazards information, including the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of Carbon Monoxide (CO).

- Air Conditioning Research indicates that of all people who die of heat stroke, about 80 percent are age 50 or older. Deaths attributed to lung disease, diabetes and hypertension increase more than 50 percent during heat waves. Heat stroke occurs 12 to 13 times more frequently in people age 65 and older than in younger persons. It is also an accepted medical fact that infants and children up to four years of age are very sensitive to the effects of high temperatures and rely on others to regulate their environment.
- Considering preventable deaths may illuminate the need for allowing air conditioning measures. While there are no statistics devoted specifically to that category in West Virginia, the next two paragraphs are devoted to understanding the health risks in our state that relate to the statements above.
- Each year in West Virginia there are approximately 1,500 Chronic Lower Respiratory Disease related deaths. According to the Center for Disease Control (CDC), West Virginia: Burden of Chronic Diseases report, in 2005, 6% of West Virginians died from stroke, and 766 people in West Virginia died from diabetes. In 2007, 10% of adults in West Virginians reported being diagnosed with nonpregnancy related diabetes.
- While hypertension is the most prevalent cause of stroke and kidney failure, hypertension must be recognized as part of a bigger disease conglomerate almost always accompanied by obesity, diabetes, kidney disease or many other co-existing problems involving lifestyle and/or genetics. The same CDC report referenced above states that 33% of West Virginian adults have high blood pressure which puts us above the national average of 25%. The report goes on to state 42% of those surveyed had high blood cholesterol, which puts them at greater risk for developing heart disease and stroke.
- Air conditioning is the number one protective factor against heat-related illness
 and death effecting people with health issues such as stated above. Therefore
 air conditioning system replacement, repair or installation is allowed to be
 categorized as health and safety in homes with occupants under four years old,
 over 65 years old and where there are at-risk occupants. Air conditioning
 system replacement, repair or installation must be attempted through cost
 justification as an ECM first before using H&S funding. Where this measure can

be justified by the approved NEAT/MHEA audit, replacement, repair or installation is not to be included in health and safety.

Persons requesting the need for air conditioning based on their health being at risk <u>must</u> provide a letter from a doctor defining the condition requiring an air conditioned environment and the maximum allowable air temperature relevant to that person's individual condition.

New replacement units must be ENERGY STAR rated and have an efficiency rating of at least:

- Central AC or Heat Pump Cooling Efficiency = 13 SEER
- Heat Pump Heating Efficiency = 7.7 HSPF
- Window and wall mount air conditioners = 10 EER
- Heating Systems Heating system repair, replacement, or installation is allowed of red-tagged, inoperable, or nonexistent heating systems where climate conditions warrant. Repair and replacement of inoperable or unsafe combustion appliances is allowed, including the installation of direct vent-sealed combustion appliances. Direct vent-sealed combustion appliances may be installed to resolve Combustion Appliance Zone (CAZ) problems. Repair and cleaning must be considered before replacement. Correction of venting is allowed when testing indicates a problem.
- Appliances and Water Heaters Poorly functioning water heaters that may pose
 a health concern may be replaced on a case-by-case basis. Installation of one
 water heater per dwelling is allowed. Repair, replacement and installation of
 moisture control appliances, such as dehumidifiers, condensate pumps and
 sump pumps are allowable on a case-by-case basis. Documentation must be
 maintained to justify replacement of water heaters and moisture control
 appliances. Replacement and installation of other appliances for health and
 safety reasons is not allowed. Repair and cleaning for other appliances is
 allowed.
- Smoke, Carbon Monoxide Detectors, and Fire Extinguishers If smoke alarms are inoperable or non-existent, at least one alarm must be installed in each weatherized dwelling on each floor. Follow the manufacturer's recommendations for locating and installing the alarm(s). Typically, alarms are installed where the clients spend the most time, such as near bedrooms. If an entire multi-family building is to receive weatherization services, a CO alarm should be installed in each unit of the complex. If existing hard-wired smoke alarms are inoperable or broken, they must be replaced with comparable units. Replacement of operative smoke alarms is not an allowable expense.

Providing fire extinguishers is allowable only when solid fuel is present. Sub-recipient will provide the client with verbal and written information on use of smoke/CO detectors and fire extinguishers where allowed.

3. Other Heating Sources

 Solid Fuel Heating - Maintenance, repair, and replacement of primary indoor heating units is allowed where occupant health and safety is a concern.
 Maintenance and repair of secondary heating units is allowed.

The WV WAP utilizes a "Solid Fuel Appliance Checklist" which addresses safety issues, including fire hazards, from wood and coal stoves. Issues relating to the stove, stove pipe, and chimney are also addressed. The auditor is required to inspect the chimney and flue and combustion appliance zone depressurization.

- **Space Heaters Stand Alone Electric -** Repair, replacement, or installation of standalone electric space heaters is not allowed. Adhere to the following procedures:
 - 1. Check the electrical circuitry to ensure adequate power for existing space heaters.
 - 2. Inform client of the hazards of use and have client sign a waiver if removal is not allowed by the client.
 - 3. Inform the client that removal is recommended. Stand-alone electric space heaters may be used as a temporary heat source during weatherization if the primary heating system is disabled.
- Space Heaters, Unvented Combustion Removal is required, except as a secondary heat where the unit conforms to ANSI Z21.11.2. Units that do not meet ANSI Z21.11.2 must be removed prior to weatherization but may remain until a replacement heating system is in place. Testing for ambient carbon monoxide (CO) is allowed. Units must be checked for the ANSI Z21.11.2 label. Clients will be informed of the dangers of unvented space heaters. CO, moisture, and Nitrogen Dioxide (NO2) can be dangerous even if the CO alarm does not sound.
- Space Heaters, Vented Combustion Vented space heaters will be treated as furnaces. Venting will be tested consistent with furnaces. Proper testing methods for safe operation (draft, CAZ and CO) will be conducted at steady state efficiency.
- **4. Fire Hazards** Correction of fire hazards is allowed when necessary to safely perform weatherization. The auditor will visually inspect the dwelling during the audit and crews will inspect while performing weatherization.

5. Occupant Pre-existing or Potential Health Conditions - The WV WAP Sub-recipients are required to take all reasonable precautions against performing work on dwellings that will subject clients to health and safety risks. Before beginning work on the dwelling, the agency must take into consideration the health concerns of each occupant, the condition of the dwelling, and the possible effect of work to be performed on any particular health or medical condition of the occupants. When a person's health is fragile and/or the work activities would constitute a health or safety hazard, the occupants at risk will be required to leave the home during these work activities.

When a person's health may be at risk and/or the work activities could constitute a health or safety hazard, the occupant at risk will be required to take appropriate action as previously identified, based on severity of risk. Temporary relocation of at-risk occupants may be allowed on a case by case basis. Failure or the inability to take appropriate actions must result in deferral.

Procedure for Identifying Occupant Health Concerns

- When a person's health may be at risk and/or the work activities could constitute a health and safety hazard, the occupant at risk will be required to take appropriate action based on the severity of the risk.
- The at-risk occupant should reveal they have known or suspected health concerns during the initial application for weatherization services.
- The at-risk occupant should be provided with known risks of the weatherization process.
- Sub-recipient contact information should be provided to the occupant so that occupant can easily provide information about health issues or concerns.
- Failure or the inability to take appropriate actions must result in deferral of the weatherization work.

Documentation for identifying occupant health concerns will include:

- Client's name and address
- Dates of the audit/assessment and when the client was informed of a potential health and safety issue
- Clear description of the problem
- Statement indicating if, or when weatherization could continue
- Client(s) signature(s) indicating that they understand and have been informed of their rights and options.

6. Indoor Air Quality

- a. Asbestos General asbestos removal is not approved as a health and safety weatherization cost. Major asbestos problems will be referred to the appropriate state agency and/or Environmental Protection Agency (EPA).
 - In siding, walls, ceilings, etc. Removal of siding is allowed to perform energy
 conservation measures. All precautions must be taken not to damage siding.
 Asbestos siding should never be cut or drilled. It is recommended where possible to
 insulate through home interior. The client will be informed that suspected asbestos
 siding is present and how precautions will be taken.
 - In vermiculite When vermiculite insulation is found in an attic, unless testing proves otherwise, take precautionary measures as if the vermiculite contains asbestos. Encapsulation by an appropriately trained asbestos control professional is allowed. Removal is not permitted. Blower door testing should be done with pressurization rather than depressurization.

Assess whether vermiculite is present. Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified prescriptive sampling is allowed by a certified tester.

Clients should be instructed not to disturb suspected asbestos containing material.

- On pipes, furnaces, other small covered surfaces Sub-recipients will assume
 asbestos is present in covering materials. Encapsulation is allowed by an AHERA
 asbestos control professional and should be conducted prior to blower door testing.
 Removal may be allowed by an AHERA asbestos control professional on a case-bycase basis. AHERA testing is allowed by a certified tester. Clients should be
 instructed not to disturb suspected asbestos containing material.
- **b. Spray Polyurethane Foam (SPF)** Spray polyurethane foam is a widely used and highly-effective insulator and sealant; however, eye, skin, and inhalation exposures to its key ingredients can cause asthma, lung damage, other respiratory problems, skin and eye irritation, and other adverse health effects.
 - When working within the thermal enclosure with spray urethane foam, follow the EPA guidelines or manufacturer's guidelines (available online at: http://www.epa.gov/dfe/pubs/projects/spf/spray_polyurethane_foam.html)
 - When using spray urethane foam outdoors, isolate the area where the foam will be applied, take precautions to ensure the fumes will not be transferred to the indoor living area.

- Make sure all State and local fire codes are followed when spray polyurethane foam is used indoors.
- Sub-recipients are required to have MSDS sheets in each weatherization vehicle with easy access to every employee.
- Auditors notify the client of the plans to use two-part foam and the precautions that may be necessary.

c. Radon - In homes where radon may be present:

- Provide the client with EPA's consumer guide to radon.
- Whenever conditions permit, exposed dirt must be covered with a vapor permeable ground cover.
- In dwellings where radon may be present, precautions should be taken to reduce the likeliness of making radon concentrations higher.
- Radon testing is an allowable DOE expense in locations with high radon potential.
- Radon abatement is not an allowable activity with DOE funds; major radon problems are deferred and referred to the appropriate local environmental agency.
- **d. Volatile Organic Compounds (VOCs)** Crew awareness of potential problems with formaldehyde and volatile organic compounds is important when addressing air sealing. Crews are instructed to remove any VOCs when possible and to give client education regarding the potential dangers. If removal cannot be performed or is not allowed by the client, the unit must be deferred.

7. Lead Paint – Lead Safe Work

Sub-recipients or contractors will follow EPA's Lead; Renovation, Repair and Painting Program (RRP). In addition to RRP, weatherization requires all weatherization crews working in pre-1978 housing to be trained in Lead Safe Weatherization (LSW). Deferral is required when the extent and condition of lead-based paint in the house would potentially create further health and safety hazards.

Testing is allowed. Job site setup and cleaning verification is required by a Certified Renovator.

Each Sub-recipient or contractor must give notification to the occupants of homes to be weatherized regarding the potential hazards of lead paint and lead paint dust if the home was built prior to 1978. EPA's publication "Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools" must be given to an adult occupant of the affected home prior to beginning weatherization. For occupied homes, the weatherization staff, crew, or contractor must have an adult tenant or homeowner sign an acknowledgement after receiving the pamphlet. As an alternative to delivery in

person, you may mail the lead hazard information pamphlet to the owner and/or tenant. Pamphlet must be mailed at least seven days before renovation. Mailing must be documented by a certificate of mailing from the post office.

OEO has developed and implemented a *Lead Safe Work Policy* on July 27, 2012 including standardized forms and processes to supplement information available from DOE and the Environmental Protection Agency (EPA). (This policy was amended on August 16, 2013.) The policy provides additional information and guidance on LSW, proper practices, and documentation requirements.

LSW includes weatherization worker protection, general LSW work practice standards, and lead dust containment standards.

Level 1 Containment.

- Level 1 containment is required in pre-1978 homes when less than 6 ft2 of interior painted surface per room or 20 ft2 of exterior painted surface will be disturbed.
- b. Level 1 containment consists of methods that prevent dust generation and contains all debris generated during the work process. The containment establishes the work area which must be kept secure.
- c. Measures that may fall within this guideline include:
 - i. Installing or replacing a thermostat.
 - ii. Drilling and patching test holes.
 - iii. Replacing HEPA filters and cleaning HEPA vacuums.
 - iv. Changing furnace filter.
 - v. Removing caulk or window putty (interior).
 - vi. Removing caulk or window putty (exterior).
 - vii. Removing weather-stripping.

2. Level 2 Containment.

a. Level 2 containment is required when weatherization activities will disturb more than 6 ft2 of interior surface per room or 20 ft2 of exterior surfaces in homes built prior to 1978. Level 2 containment consists of methods that define a work area that will not allow any dust or debris from work area to spread. Level 2 containment requires the covering of all horizontal surfaces, constructing barrier walls, sealing doorways, covering HVAC registers with approved materials, and closing windows to prevent the spread of dust and debris.

- b. Measures requiring level 2 containment may include:
 - i. Drilling holes in interior walls.
 - ii. Drilling holes in exterior walls, removing painted siding.
 - iii. Cutting attic access into ceiling or knee walls.
 - iv. Plane a door in place.
 - v. Replacing door jambs and thresholds.
 - vi. Replacing windows or doors.
 - vii. Furnace replacements.
- c. Additionally, Level 2 containment must ALWAYS be used where any of the following is conducted (even if the activities will disturb less than the hazard levels within the Level 1 category):
 - i. Window replacement.
 - ii. Demolition of painted surface areas.
 - iii. Using any of the following: Open-flame burning or torching; machines to remove paint through high-speed operation without HEPA exhaust control; or operating a heat gun at temperatures at or above 1100 FO. Note that the use of a drill, reciprocating saw, or other power tool is considered a "machine" for removing paint. As examples: Cutting an hatch inside the dwelling or interior drilling of holes for the installation of insulation require level two containment.
- 3. There must be adequate documentation in the client file to demonstrate that lead safe weatherization measures were performed when necessary. Documentation should include photos of the site and containment set up, as well as a listing of materials used and measures taken. Post Work Inspector must also certify that LSW procedures were used and properly implemented.
- 4. WV WAP will adhere to EPA lead safe rules as written in the *Lead; Renovation, Repair, and Painting Program Final Rule* (LRRPP Final Rule), as directed by DOE.
- 5. Weatherization of HUD program housing stock, including HUD Section 8, is infrequent in West Virginia. These units will only be weatherized if the owner provides a "Certificate of Lead-Based Paint Compliance" (copy must be in client file) that documents abatement or control of any lead paint hazard has been addressed, and will agree that the local Sub-recipient will not be liable for any lead hazards, provided the safe work practices generally outlined above are employed.
- 6. In cases where the Sub-recipient cannot safely weatherize a home due to lead paint hazards, the Sub-recipient may defer the work. Such deferral will be considered by the state on a case-by-case basis. Sub-recipients may not weatherize dwellings where there are cases of documented or suspected lead

poisoning. Additionally, they will not weatherize homes where there is an extraordinary lead paint hazard with no means to abate the hazard, including insufficient funds or insufficient training to properly address the hazard.

8. Building Structures and Roofing - WV WAP crews often encounter homes in poor structural condition. In some cases, Weatherization Assistance Program services have to be deferred until the dwelling is made safe and able to weatherize. When possible,

Sub-recipients coordinate their efforts with other programs to enable and enhance services. Homes with conditions that require more than incidental repair should be deferred.

The Auditor will perform a visual inspection to ensure that access to areas necessary for weatherization is safe for entry and performance of assessment, work, and inspection. The client will be notified of structurally compromised areas.

9. Electrical Issues

• **Electrical – other than Knob-and Tube Wiring -** Minor electrical repairs are allowed where health and safety of the occupant is at risk. Upgrades and repairs are allowed when necessary to perform specific weatherization measures.

Auditors will perform a visual inspection. Voltage drop and voltage detection testing are allowed.

 Electrical – Knob-and Tube Wiring - Minor upgrades and repairs necessary for weatherization measures and where the health or safety of the occupant is at risk are allowed.

Where live knob-and-tube wiring exists, the following conditions must be met in order to install attic insulation:

- a. Wiring insulation must be intact and complete with no exposed areas and connections.
- b. S-type fuses that match the size of the wiring must be installed if they do not already exist. Any modification of the electrical panel must have prior written permission from the client. The Sub-recipient may wish to contract with a licensed electrician where questionable safety conditions exist.
- c. When installing cellulose or fiberglass, there must be a minimum of 1-inch clearance from the wiring. Precaution must be taken to prevent the possible drifting of the product, which could result in contact with the wiring.

The presence of knob-and-tube wiring, overloaded circuits, live bare wires, asbestos siding, or untreatable moisture in the wall cavities will be allowable reasons for not insulating exterior walls. If the problems can be corrected within reasonable means, the walls may be insulated.

- **10.** *Refrigerant Issues* Sub-recipients may reclaim refrigerant per the Clean Air Act of 1990, Section 608, as amended by 40 CFR 82, 5/14/1993. Qualified personnel use EPA testing protocols. Clients are instructed not to disturb refrigerants. Qualified personnel are trained on the EPA-approved section 608 type I or universal certification.
- **11.** *Code Compliance* The correction of preexisting code compliance issues is not an allowable cost other than where weatherization measures are being conducted. As per DOE WPN 11-06:

"Correction of preexisting code compliance issues is not an allowable cost other than where weatherization measures are being conducted. State and local (or jurisdiction having authority) codes must be followed while installing weatherization measures. Condemned properties and properties where "red tagged" health and safety conditions exist that cannot be corrected under this guidance should be deferred." Testing required: "Visual inspection. Local code enforcement inspections" The Sub-recipient personnel should also "Inform client of observed code compliance issues" according to the guidance.

12. *Pests* - In dwellings were pests are detected:

- Pest removal is cause for deferral unless other funds are available or the cost is considered when running NEAT or MHEA. Screening of windows and points of access is allowed to prevent pest intrusion.
- 2. Auditors will assess the presence and degree of infestation and risk to workers.
- 3. Auditors will inform clients of the observed condition and associated risks.
- **13.** Ventilation A complete review of the ASHRAE 62.2-2013 minimum ventilation standards was completed during the last program year. During this review stage OEO evaluated the most effective methods for full compliance to ASHRAE 62.2-2013. Subrecipients key personnel received training at the New River Community and Technical College in August 2013 and continued training will occur as necessary.

Weatherization trained personnel will calculate the ventilation requirements for each home utilizing a ASHRAE 62.2-2013 spreadsheet or Residential Energy Dynamics (RED) online tool to ensure adequate indoor air quality. Continuous and/or intermittent ventilation fans will be installed based upon spreadsheet calculations. The ASHRAE 62.2-2013 standard was implemented December 1, 2013 and is monitored by the OEO weatherization specialist field monitors.

For homes that require added ventilation, agencies must implement a ventilation strategy that meets the requirements of ASHRAE 62.2-2013. Agencies are required to evaluate any preexisting mold and moisture conditions, potential spot ventilation needs and pre and post fan flow rates. If whole-house ventilation requirements are less than or equal to 15 CFM, then additional ventilation is not required. If the Energy Auditors pre-site evaluation determines that due to existing conditions the threshold ventilation is warranted, it will be allowed.

If the whole-house minimum ventilation requirement is greater than 15 CFM, a system supplying the design ventilation airflow must be installed. The agency Quality Control Inspector will verify that fan flow rates have been met based on design requirements.

Implementing ASHRAE 62.2-2013 will not be required where acceptable indoor air quality already exists. Existing ventilation systems will not be updated if found to be adequate and in good operating condition.

Sub-recipients will provide clients with information on function, use, and maintenance of ventilation system and components. Sub-recipients will provide a disclaimer that ASHRAE 62.2-2013 does not account for high polluting sources or guarantee indoor air quality.

- **14.** Window and Door Replacement, Window Guards Replacement, repair or installation of windows or doors is not an allowable health and safety cost, but may be allowed as an efficiency measure if justified by the NEAT or MHEA audit.
- **15.** *Injury Prevention of Occupants and Weatherization Workers* Minor repairs may be done when weatherizing a home in order to prevent injury to weatherization workers and to occupants. These repairs may only be done to the extent of ensuring safety.
- 16. Occupational Safety and Health Administration (OSHA) and Crew Safety Weatherization personnel must follow applicable OSHA standards and Material Safety Data Sheets (MSDS) and take precautions to ensure the health and safety of themselves and other personnel. MSDS must be posted wherever workers may be exposed to hazardous materials.

Sub-recipients must perform assessments to determine if crews are practicing and utilizing safe work practices and that all workers receive training specific to hazards that the worker can reasonably expect to encounter on a particular job site.

- 1. Sub-recipients are also required to have bi-monthly safety meetings.
- 2. All auditors, crews, and contractors must use and understand the importance of personal protection equipment (PPE).

3.	OSHA 10 training for all current weatherization personnel and OSHA 30 for all crew leaders is not required but considered a best practice.

DOE	DOE, DHHR, Utilities (as applicable)	v.10.2014		
Energy	Direct material for Energy Conservation	Ancillary Items (Cost must be	Incidental Repair Measure (IRM) (Cost must Health & Safety Measure (Separate	Health & Safety Measure (Separate
Conservation Measure	Measure	included in SIR for associated individual ECM)	be included in SIR for whole unit package of cost justification, not included in SIR) ECM)	cost justification, not included in SIR)
	heating system clean/tune	black pipe	drywall	barometric damper
	heating system repair	black pipe fittings	lumber	black pipe
	heating system replacement	barometric damper	paneling	black pipe fittings
	heat pump replacement	breaker	plywood	blower motor
		coil cleaner		breaker
		condensate pump		B-vent & Accessories
		cottage stands		coil cleaner
		drywall		condensate pump
		filter grills		contactor
		floor register		electric heat strip
		furnace filter		electrical disconnect
		metal flex tape		fan switch
		mounting brackets		filter grills
		mounting pad		flexible gas line
		oil filter		floor registers
		pvc pipe		fuel filter canister
ਬu		sheet metal one sheet or less		furnace filters
ite		strapping		heat chamber
:ə		thermostat		heat shield
ī		wire		heat shield insulators
				heat tape (condensate line)
				heating system repair
				heating system replacement
				knob & tube wiring (minor repair)
				louvered door
				limit
				oil filters
				oil nozzles
				pipe insulation (condensate line)
				pvc pipe
				stove pipe & accessories
				thermocouple
				thermostat
				transfer grille
				transformer
				wire
	conline curtom and account	-		
	coomig system replacement	Treon		a-coil
		Turnace filter	lumber	air filters
		line set	plywood	blower motor

Air Conditioning

breaker	contactors	diffusers	electrical disconnect	filter grill	freon	heating element	line set	thermostat	thermostat wire	transformer	wire
metal duct tape	mounting pad	sheet metal	straps	thermostat	thermostat wire	zip ties					

Energy	Direct material for Energy Conservation	Ancillary Items (Cost must be	Incidental Repair Measure (IRM) (Cost must	Health & Safety Measure (Separate
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Measure		individual ECM)	ECM)	
	2-part foam	mesh tape	s-strap	2-part foam
3u	flex duct	metal duct tape		flex duct
ile	mastic	silicone caulk		mastic
	sheet metal	zip ties		sheet metal
ū	2-part foam	mesh tane		
t. tioid	flex duct	metal duct tape		
one	foil faced duct wrap	stables		
	vinyl duct wrap	vinyl duct tape		
л Л		zip ties		
	attich hatch (ONLY when insulation is required)	dam materials	attic vents (ONLY when insulation is installed)	minor roof repair of leaking roof that may
ū	90111193	drawal (can lighte)	caulking (MH guttering ONLY when insulation is	create moisture/mold issue in attic insulation
oi	fiberglass	roof coating	flacking	
iel		ginon in	MAL STATES	
nsu		hinges	side life method)	knob & tube wiring (minor repair)
<u>IJ 3</u>		latches	roll roofing	
[11		insulation	roof coating (ONLY when isulation is required)	
Ā		flashing		
		high-temp silicone sealant		
		insul-shield		
	cellulose	chair railing	primer/sealer	knob & tube wiring
ck		dry wall compound	roof coating (ONLY when insulation is required)	minor roof renair of leaking roof that may
ьq		plywood (<1 sheet)		create moisture/mold issue in new wall
əsu		sealing high/low openings in balloon		insulation
De		sheet rock (<1 sheet)		
		wall plugs		
əs	fiberglass	4" inspection port	flashing	
			MH guttering (ONLY when insulation is installed	
g-u		wall plugs	side life method)	
			primer/sealer	
N			roof coating (ONLY when insulation is required)	
ī	fiberglass (batt)	adhesive spray	belly repair (when insulation is required)	knob & tube wiring (minor repair)
uə	fiberglass (blown)	belly repair of insulation access holes	vapor barrier (when floor is insulated)	plumbing leak repair
u	rigid foam board	(including belly patch, board, tape)		

pipe wrap (only when floor insulated) insulation support rods netting

Floor Treat

included in SIR for associated individual ECM) caulk drywall fasteners paneling rope caulk shims trim stops caulk drywall fasteners hinges knobs paneling primer/sealer stops trim caulk ac cover trim caulk ac cover stops hinges hinges hinges hinges hinges paneling primer/sealer stops frim caulk ac cover stops hinges	Energy	Direct material for Energy Conservation	Ancillary Items (Cost must be	Incidental Repair Measure (IRM) (Cost must Health & Safety Measure (Separate	Health & Safety Measure (Senarate
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	95	mastic			
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cfl bulb-specialty	water heater tape	light socket	replace flazal dous light lixture or socket
cfl bulb-standard		70000	water heater discharge pipe
cool roof coating			water leak repail
door replacement			water neater replacement
faucet aerator-bathroom			
faucet aerator-kitchen			
et aerator-other			
flow showerhead			
flow showerhead-handheld			
gerator replacement			
er heater jacket			
er heater pw (1st 6ft only, h&c at wh)			
er heater replacement			
er heater top			
low replacement			
			A mil plactic (close)
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			blue painters tape
			breakers
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			dehumidifier
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	The state of the s		duct tape
			electrical panel box
			exhaust vents/fans
			fan controller
			guttering and accessories
			kitchen range hood kit
			make-up air fan
			lead check swabs
			roof coating
			smoke detectors
			tack mats
			vapor barrier
			venting
			water heater discharge pipe
			water heater replacement
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wire

Agency	Address	Type of Organization	Tentative	Dwellings	Source(s)	Congressional District(s)	Counties
Change, Inc.	3136 West Street, Weirton, WV 26062	Community Action Agency	\$118,445.00	15	In-House Crews	1	Served
Coalfield Community Action Partnership, Inc.	PO Box 1406, Williamson, WV 25661	Community Action Agency	\$242,030.00	30	In-House Crews	2 & 3	Boone, Clay, Kanawha, Mingo
Community Action of SE WV	307 Federal Street STE 323, Bluefield WV 24701	Community Action Agency	\$200,698.00	25	In-House Crews	က	Mercer, Monroe, Raleigh, Summers
Community Resources, Inc	133 Rosemar RD STE 101, Parkersburg, WV 26104	Community Action Agency	\$257,657.00	32	In-House Crews	182	Calhoun, Doddridge, Gilmer, Jackson, Pleasants, Ritchie, Roane, Tyler, Wetzel, Wirt, Wood
Council of the Southern Mountains, Inc.	148 McDowell Street, Welch, WV 24801	Community Action Agency	\$42,566.00	Ŋ	In-House Crews	m	McDowell
Eastern WV Community Action Agency, Inc.	401 Maple Avenue, Moorefield, WV 26836	Community Action Agency	\$212,625.00	72	In-House Crews	18.2	Berkeley, Grant, Hampshire, Hardy, Jefferson, Mineral, Morraan, Penaleson,
Mountain CAP of WV, Inc.	26 N Kanawha Street STE 201, Buckhannon, WV 26201	Community Action Agency	\$99,526.00	13	In-House Crews	283	Braxton Lewis Unshur Webster
MountainHeart Community Services, Inc.	PO Box 1509, Oceana, WV 24870	Community Action Agency	\$89,245.00	11	In-House Crews	က	Favette, Wyoming
Nicholas CO Community Action Partnership, Inc.	1205 Broad Street, Summersville, WV 26651	Community Action Agency	\$34,960.00	4	In-House Crews	ĸ	Nicholas
North Central WV Comm Action Assoc	1304 Goose Run Road, Fairmont, WV 26554	Community Action Agency	\$445,194.00	59	In-House Crews	1, 2, & 3	Barbour, Greenbrier, Harrison, Marion, Monongalia, Pocahontas, Preston, Randolph, Taylor, Tucker
PRIDE Community Services, Inc.	PO Box 1346, Logan, WV 25601	Community Action Agency	\$48,529.00	9	In-House Crews	က	Logan
Southwestern Comm Action Council, Inc.	540 5th Avenue, Huntington, WV 25701	Community Action Agency	\$264,855.00	34	In-House Crews	2&3	Cabell, Lincoln, Mason, Putnam, Wayne